

1 JENNIFER R. LIAKOS (SBN 207487)

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7 *Attorneys for Movant LL John Doe JRO*

8 **UNITED STATES BANKRUPTCY COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 In re:

Case No.: 23-30564

11 THE ROMAN CATHOLIC ARCHBISHOP
12 OF SAN FRANCISCO,

Chapter 11

13 Debtor and Debtor In
14 Possession,

**DECLARATION OF JENNIFER R. LIAKOS,
ESQ. IN SUPPORT OF MOTION FOR AN
ORDER TO ENLARGE THE CLAIMS BAR
DATE TO ALLOW FILING OF LATE
PROOF OF CLAIM**

Date: October 23, 2025

Time: 1:30 p.m.

Location: Remotely Via Zoom

Honorable Dennis Montali

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1. I am the founding and managing partner at Liakos Law, APC, counsel of record for LL John Doe JRO (“Movant”) in this action. Liakos Law, APC, primarily handles cases involving childhood sexual abuse. I am licensed to practice law in the Courts of the State of California. I am counsel of record for Movant LL John Doe JRO, as well as other claimants in the above-captioned Chapter 11 bankruptcy action. I am an adult California resident, competent to testify, and if called as a witness, my testimony under oath would be as follows.

3. Attached hereto and incorporated by reference herein as **Exhibit 1** is a true and correct copy of Movant's Master Complaint for Damages in Case No. 22CV022760, filed in Alameda Superior Court in California on November 29, 2022. Movant's Complaint alleges that he was sexually abused by Father Bresnahan in Oakland from approximately 1952-1955. Movant filed the required Certificates of Merit with Alameda Superior Court on December 27, 2022. On February 15, 2023, the Alameda Superior Court issued an order approving Movant's Certificates of Merit and granting Movant permission to serve defendants. Father Bresnahan was associated with the Diocese of San Francisco until the formation of the Diocese of Oakland in 1962.

5. On May 8, 2023, the Diocese of Oakland filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code. As a result of the voluntary petition, an automatic stay was ordered and Movant was unable to conduct discovery. On May 25, 2023, bankruptcy counsel for the Diocese of Oakland refused to accept service of the summons and Complaint because the automatic stay was in place. A true and correct copy of this May 25, 2023 correspondence is attached hereto and incorporated by reference herein as **Exhibit 3**.

6. Attached hereto and incorporated by reference herein as **Exhibit 4** is a true and correct copy of Movant's Proof of Claim form submitted in the Diocese of Oakland bankruptcy proceedings on September 11, 2023.

7. On August 21, 2023, The Debtor filed a voluntary chapter 11 Bankruptcy Petition. Dkt. No. 1. On September 21, 2023, the Debtor filed its Statement of Methodology Regarding the Debtor's Schedules of Assets and Liabilities and Statements of Financial Affairs, which included the Debtor's Schedules of Assets and Liabilities. Dkt. 152.

8. My firm prepared and submitted multiple proof of claim forms for claimants in the Diocese of San Francisco bankruptcy proceeding, however Movant did not submit a proof of claim form.

9. On August 20, 2025, counsel for the Diocese of Oakland Creditors' committee emailed my office and informed me that the Diocese of Oakland was not the correct defendant.

10. I have reviewed the docket for this case, and to date, the Debtor has not filed any proposed Plan of Reorganization.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 5th day of September 2025, at Torrance, California.



Jennifer R. Liakos

Exhibit 1

JENNIFER R. LIAKOS, ESQ. (SBN #207487)
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ELECTRONICALLY FILED
Superior Court of California,
County of Alameda
11/29/2022 at 11:56:04 AM
By: Xian-xii Bowie,
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

LL JOHN DOE JRO, individually,
Plaintiff,

v.

DEFENDANT DOE DIOCESE;
DEFENDANT DOE PARISH; DEFENDANT
DOE RELIGIOUS ORDER, DEFENDANT
DOES 1 through 500, inclusive,
Defendants.

NORTHERN CALIFORNIA CLERGY
CASES

Case No.: **22CV022760**
JCCP 5108

Judge: Hon. Evelio Grillo
Coordination Trial Judge
Department: 21

**MASTER COMPLAINT FOR DAMAGES
FOR:**

- (1) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS;
- (2) HUMAN TRAFFICKING (*CIVIL CODE* §52.5)
- (3) NEGLIGENCE;
- (4) NEGLIGENT SUPERVISION;
- (5) NEGLIGENT RETENTION/HIRING;
- (6) NEGLIGENT FAILURE TO WARN, TRAIN OR EDUCATE;
- (7) BREACH OF FIDUCIARY DUTY;
- (8) CONSTRUCTIVE FRAUD (*CIVIL CODE* §1573);
- (9) SEXUAL HARASSMENT (*CIVIL CODE* §51.9);
- (10) FRAUDULENT TRANSFER (*CIVIL CODE* §3439, *ET SEQ.*);
- (11) SEXUAL BATTERY (*CIVIL CODE* § 1708.5 ;
- (12) SEXUAL ASSAULT
- (13) GENDER VIOLENCE
- (14) VIOLATION OF *PENAL CODE* §288(A) ;
- (15) VIOLATION OF *PENAL CODE* §647.6(A) ;
- (16) VIOLATION OF *PENAL CODE* §265.

DEMAND FOR JURY TRIAL

COMES NOW, the Plaintiffs who hereby complain and allege against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE PERPETRATOR, and DOES 1 through 500, inclusive (“Defendants”), as follows:

GENERAL ALLEGATIONS APPLICABLE TO ALL CLAIMS

1. The Plaintiffs, survivors of childhood sexual abuse, bring this action to hold the religious institutions accountable that they and their family entrusted with their safety as minor children; institutions that harbored their perpetrators and failed to protect these minor children with whom the RELIGIOUS ENTITY DEFENDANTS stood *in loco parentis*. This case seeks to vindicate the rights of these survivors who unnecessarily suffered abuse at the hands of trusted religious leaders, to whom they were vulnerable and which they trusted. This Master Complaint has been created and will be adopted by each Plaintiff assigned to the Coordinated Proceeding, *Northern California Clergy Cases*, JCCP Case No. 5108. Hereinafter, the term “Plaintiff” will be utilized, and referring to each Plaintiff that provides an adoption form to this Master Complaint.

THE PLAINTIFF

2. The Plaintiff is an adult individual, who is under the age of forty (40) years old. Therefore, the Plaintiff need not file Certificates of Merit, pursuant to *Code of Civil Procedure* §340.1(g) and is permitted to name the Defendants in this action by their true and correct names.

3. The Plaintiff is an adult individual, who is over the age of forty (40) years old. Therefore, the Plaintiff has filed a declaration from a mental healthcare practitioner, and an attorney declaration for each named defendant in this Action, pursuant to the requirements of *Code of Civil Procedure* §340.1. Moreover, each named defendant in this action shall be named as a “Doe” pursuant to the requirement of *Code of Civil Procedure* §340.1(n), until such time as a declaration of corroborative fact has been approved by the Court.

4. A declaration of corroborative fact has been filed in this matter and approved by a Court of competent jurisdiction. As such, the Plaintiff, who is over the age of forty (40) years of age, is permitted to name the Defendants by their true and correct names.

5. The Plaintiff is a minor, thus, the instant Complaint is brought by and through the Plaintiff’s Guardian *ad litem*.

6. The Plaintiff is currently a resident of the State of California.

7. The Plaintiff was a resident of the State of California, during the time when the childhood sexual abuse, harassment and/or assault occurred.

8. The childhood sexual abuse, harassment, and/or assault occurred within the State of California, at least in part.

DEFENDANTS

(Defendant, DOE ARCHDIOCESE)

9. Defendant DOE ARCHDIOCESE is at all times mentioned herein was and is, a corporation sole, having its principal place of business in the County of San Francisco, State of California. Defendant DOE 1 purposely conducts substantial business activities in the State of California, and was the primary entity owning, operating and controlling the activities and behavior of its employees, agents, volunteers, and/or servants, including the DOE PERPETRATOR, as well as DOES 1 through 500 and all other employees, agents, and supervisors of those defendants.

10. The Plaintiff is informed and believes, and thereon alleges that Defendant DOE ARCHDIOCESE was an entity that supervised priests, supervised children, and understood that children would be in its programs, on its premises, and in the care, custody, and control of Defendant DOE ARCHDIOCESE, including the Plaintiff when they were parishioners, and/or participants in religious, recreational, athletic, and/or social activities, altar servers and/or students.

11. At all relevant times herein, DOE RELIGIOUS ORDER was required to obtain permission from DOE ARCHDIOCESE, in order for its religious personnel to be assigned within DOE ARCHDIOCESE, and to be in contact with minor children within those institutions. As such, DOE ARCHDIOCESE had a duty to ensure that those DOE RELIGIOUS ORDER personnel were safe to be around minor children and parishioners.

(Defendant, DOE DIOCESE)

12. Defendant DOE DIOCESE, at all times mentioned herein, was and is a corporation sole, having its principal place of business in the State of California. Defendant DOE 1 purposely conducts substantial business activities in the State of California, and was the primary entity owning, operating and controlling the activities and behavior of its employees, agents, volunteers

1 and/or servants, including the DOE PERPETRATOR, as well as DOES 1 through 500 and all other
2 employees, agents, and supervisors of those defendants. The Plaintiff is informed and believes, and
3 thereon alleges that Defendant DOE DIOCESE was an entity that supervised priests, supervised
4 children, and understood that children would be in its programs, on its premises, and in the care,
5 custody, and control of Defendant DOE 1, including the Plaintiffs when they were parishioners,
6 participants in religious, recreational, athletic, and social activities, altar servers and/or students.

7 13. At all relevant times herein, DOE RELIGIOUS ORDER was required to obtain
8 permission from DOE DIOCESE, in order for its religious personnel to be assigned within DOE
9 DIOCESE, and to be in contact with minor children within those institutions. As such, DOE
10 DIOCESE had a duty to ensure that those DOE RELIGIOUS ORDER personnel were safe to be
11 around minor children and parishioners.

12 **(Defendant, DOE PARISH)**

13 14. Defendant DOE PARISH, at all times mentioned herein, was and is, a religious
14 corporation, having its principal place of business in the State of California. Defendant DOE
15 PARISH purposely conducts substantial business activities in the State of California, and was the
16 primary entity owning, operating and controlling the activities and behavior of its employees,
17 agents, volunteers, and/or servants including but not limited to the DOE PERPETRATOR, as well
18 as DOES 1 through 500 and all other employees, agents, and supervisors of those defendants. The
19 Plaintiffs are informed and believe, and thereon allege that Defendant DOE 1 was an entity that
20 supervised priests, supervised children, and understood that children would be in its programs, on
21 its premises, and in the care, custody, and control of Defendant DOE 1, including the Plaintiffs
22 when they were parishioners, participants in religious, recreational, athletic, and social activities,
23 altar servers and/or students.

24 15. Defendant DOE PARISH was incorporated after the childhood sexual abuse of the
25 Plaintiff, and was incorporated, as an entity wholly owned, controlled, managed, operated, and
26 supervised by DOE ARCHDIOCESE and/or DOE DIOCESE. It is based upon information, and
27 therefore belief, that DOE PARISH was incorporated as a successor-in-interest to and/or *alter ego*
28 of DOE DIOCESE and/or DOE ARCHDIOCESE.

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1 22. The Plaintiff is informed and believes, and thereupon alleges, that the true names
2 and capacities, whether individual, corporate, associate or otherwise, of Defendants named herein
3 as DOES 8 through 50, inclusive, are unknown to the Plaintiff, who therefore sues said Defendants
4 by such fictitious names. Plaintiff will amend the Complaint to allege their true names and
5 capacities when such have been ascertained. Upon information and belief, each of the said Doe
6 Defendants is responsible in some manner under *Code of Civil Procedure* §§340.1(a)(1),(2),(3),
7 and 340.1 (c) for the occurrences herein alleged, and were a legal cause of the childhood sexual
8 assault which resulted in injury to the Plaintiff as alleged herein.

9 23. Plaintiff is informed and believes, and on that basis allege, that at all times
10 mentioned herein, there existed a unity of interest and ownership among Defendants and each of
11 them, such that any individuality and separateness between Defendants, and each of them, ceased
12 to exist. Defendants and each of them, were the successors-in-interest and/or alter egos of the other
13 Defendants, and each of them, in that they purchased, controlled, dominated and operated each
14 other without any separate identity, observation of formalities, or other manner of division. To
15 continue maintaining the facade of a separate and individual existence between and among
16 Defendants, and each of them, would serve to perpetrate a fraud and an injustice.

17 24. Plaintiff is informed and believes, and on that basis alleges, that at all times
18 mentioned herein, Defendants and each of them were the agents, representatives and/or employees
19 of each and every other Defendant. In doing the things hereinafter alleged, Defendants and each of
20 them, were acting within the course and scope of said alternative personality, capacity, identity,
21 agency, representation and/or employment and were within the scope of their authority, whether
22 actual or apparent. Plaintiff is informed and believes, and on that basis alleges, that at all times
23 mentioned herein, Defendants and each of them were the trustees, partners, servants, joint
24 venturers, shareholders, contractors, and/or employees of each and every other Defendant, and the
25 acts and omissions herein alleged were done by them, acting individually, through such capacity
26 and within the scope of their authority, and with the permission and consent of each and every other
27 Defendant and that said conduct was thereafter ratified by each and every other Defendant, and that
28 each of them is jointly and severally liable to Plaintiff.

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- d. Suicidal ideation or thoughts;
- e. Suicide attempts;
- f. Anger;
- g. Betrayal;
- h. Loss of faith;
- i. Nervousness;
- j. Problems with those in positions of authority;
- k. Interpersonal relationship problems with those in positions of confidence or trust;
- l. Problems interacting with others, including but not limited to family members;
- m. Guilt, shame, and/or humiliation;

30. As a direct and proximate result of the childhood sexual assault, harassment and abuse committed against the Plaintiff by the DOE PERPETRATOR, which was enabled and facilitated by RELIGIOUS ENTITY DEFENDANTS, Plaintiff has, and will continue to, incur expenses for mental, psychological, psychiatric, and medical care due to the assault, according to proof at trial:

- a. Future Medical Expenses, including but not limited psychological and/or psychiatric care;
- b. Past Medical Expenses (Past) including but not limited psychological and/or psychiatric care;

31. As a further direct and proximate result of the DOE PERPETRATOR's sexual assaults, harassment and abuse, which was enabled and facilitated by RELIGIOUS ENTITY DEFENDANTS, Plaintiffs have suffered additional economic injury as follows:

- a. Lost earning capacity (Future);
- b. Lost income (Past).

32. These damages were all suffered as to the Plaintiff's general, special and consequential damage in an amount to be proven at trial, but in no event less than the minimum jurisdictional amount of this Court.

**DUTIES OF THE RELIGIOUS ENTITY DEFENDANTS TO PROTECT THE
PLAINTIFF AND CONTROL THE DOE PERPETRATOR**

1 33. At all times herein, the RELIGIOUS ENTITY DEFENDANTS, and each of them,
2 knew or should have known that the DOE PERPETRATOR was unfit, posed a risk of harm to
3 minor children, and/or posed a risk of childhood sexual assault to minor children in its care, custody
4 and control. Specifically, RELIGIOUS ENTITY DEFENDANTS knew or should have known, or
5 were otherwise on notice, that the DOE PERPETRATOR had engaged in misconduct that created
6 the risk of childhood sexual assault and failed to take reasonable steps or to implement reasonable
7 safeguards to avoid acts of childhood sexual assault by the DOE PERPETRATOR on minors,
8 including Plaintiff.

9 34. As a priest, employee, representative, servant, agent, and/or volunteer of
10 RELIGIOUS ENTITY DEFENDANTS, and DOES 1 through 500, the DOE PERPETRATOR was
11 placed into a position of moral, ethical, religious, and legal authority over the Plaintiffs, their
12 parents, and parishioners with whom became into contact. The DOE PERPETRATOR was a
13 confidant to the Plaintiffs and their families, and as a result, there was a special, trusting,
14 confidential and fiduciary relationship between the Plaintiff and the DOE PERPETRATOR, as well
15 as between Defendants DOE 1 and DOES 1-50 and the Plaintiff. Through this relationship with the
16 Plaintiff, Defendants DOE 1 stood *in loco parentis* with the Plaintiff and Plaintiff's family.
17 Specifically, Defendants took the Plaintiff into their custody, care and control, which conferred
18 upon the Plaintiff and their families the reasonable belief that the Plaintiff, a minor children, would
19 be protected and cared for, as if Defendants were the Plaintiffs' own parents.

20 35. As a minor at DEFENDANT RELIGIOUS ENTITIES, where the DOE
21 PERPETRATOR was employed, retained, and worked, Plaintiff was under the DOE
22 PERPETRATOR's, as well as DOE 1 and DOES 1-50's direct supervision, care and control, thus
23 creating a special relationship, fiduciary relationship, and/or special care relationship with
24 Defendants, and each of them. Additionally, as minor children under the custody, care and control
25 of Defendants, Defendants stood *in loco parentis* with respect to Plaintiff while Plaintiff was at
26 DOE 1 and DOES 1 through 500. As the responsible parties and/or employers controlling the DOE
27 PERPETRATOR, Defendants were also in a special relationship with Plaintiff, and owed special
28 duties to Plaintiff.

1 36. Defendants also intentionally and willfully implemented various measures intended
2 and designed to, or which effectively, made the DOE PERPETRATOR's conduct harder to detect
3 including, but not limited to:

- 4 a. Assigning and permitting the DOE PERPETRATOR to remain in a position
5 of authority and trust after DEFENDANT RELIGIOUS ENTITIES and
6 DOES 1 through 500 knew or should have known that was an unfit agent,
7 servant, employee, member and/or volunteer;
- 8 b. Assigning and permitting the DOE PERPETRATOR to remain in a position
9 of authority and trust after DEFENDANT RELIGIOUS ENTITIES and
10 DOES 1 through 500 knew or should have known that was in misconduct
11 that created a risk of childhood sexual assault to be perpetrated by the DOE
12 PERPETRATOR;
- 13 b. Placing the DOE PERPETRATOR in a separate and secluded environment,
14 including placing him in charge of children, which allowed the DOE
15 PERPETRATOR to sexually and physically interact with and assault the
16 children, including Plaintiff;
- 17 c. Authorizing the DOE PERPETRATOR to come into contact with minors,
18 including Plaintiff, without adequate supervision;
- 19 d. Failing to inform, or concealing from Plaintiff's parents and law
20 enforcement officials the fact that Plaintiff and others were or may have
21 been sexually assaulted after Defendants knew or should have known that
22 the DOE PERPETRATOR may have sexually assaulted Plaintiff or others,
23 thereby enabling Plaintiff to continue to be endangered and sexually
24 assaulted, and/or creating the circumstance where the Plaintiff and others
25 were less likely to receive medical/mental health care and treatment, thus
26 exacerbating the harm to Plaintiff;
- 27 e. Holding out and affirming the DOE PERPETRATOR to Plaintiff and
28 Plaintiff's parents, other children and their parents, and to the community
as being in good standing and trustworthy;
- f. Failing to take reasonable steps, and to implement reasonable safeguards to
avoid acts of unlawful sexual conduct by the DOE PERPETRATOR with
students minor children; and
- g. Failing to put in place a system or procedure to supervise or monitor
employees, volunteers, representatives or agents to insure that they did not
molest or assault minors in Defendants' custody or care, including Plaintiff.

37. By his position within the DEFENDANT RELIGIOUS ENTITIES, Defendants
demanded and required that Plaintiff respect the DOE PERPETRATOR in his position of priest,
spiritual advisor, confidant, teacher, and/or mentor at DEFENDANT RELIGIOUS ENTITIES and
DOES 1 through 500.

1 38. Plaintiff is informed and believe, and on that basis allege, that Defendants and each
2 of them, were or should have been aware of the DOE PERPETRATOR's wrongful conduct at or
3 about the time it was occurring, and thereafter, but took no action to obstruct, inhibit or stop such
4 continuing conduct, or to help Plaintiff endure the trauma from such conduct. Despite the authority
5 and ability to do so, these Defendants negligently and/or willfully refused to, and/or did not act
6 effectively to stop the sexual assaults on the Plaintiff, to inhibit or obstruct such assault, or to protect
7 the Plaintiff from the results of that trauma.

8 39. During the period of assaults perpetrated upon the Plaintiff, DEFENDANT
9 RELIGIOUS ENTITIES and DOES 1 through 500 had the authority and the ability to obstruct or
10 stop the DOE PERPETRATOR's sexual assaults on the Plaintiff, but intentionally, negligently
11 and/or willfully failed to do so, thereby allowing the assault to occur and to continue unabated. This
12 failure was a part of Defendants' intended plan and arrangement to conceal wrongful acts, to avoid
13 and inhibit detection, to block public disclosure, to avoid scandal, to avoid the disclosure of their
14 tolerance of child sexual molestation and assault, to preserve a false appearance of propriety, and
15 to avoid investigation and action by public authority including law enforcement. The Plaintiff is
16 informed and believes, and on that basis alleges, that such actions were motivated by a desire to
17 protect the reputation of Defendants and each of them, and to protect the monetary support of
18 Defendants while fostering an environment where such assault could continue to occur.

19 **STATUTE OF LIMITATIONS**

20 40. Pursuant to *Code of Civil Procedure* §340.1(q) as amended by Assembly Bill 218,
21 effective January 1, 2020 there is a three (3) year window in which all civil claims of childhood
22 sexual assault are revived if they have not been litigated to finality. This provision provides that,
23 "[n]otwithstanding any other provision of law, any claim for damages described in paragraphs (1)
24 through (3), inclusive, of subdivision (a) that has not been litigated to finality and that would
25 otherwise be barred as of January 1, 2020, because the applicable statute of limitations, claim
26 presentation deadline, or any other time limit had expired, is revived, and these claims may be
27 commenced within three years of January 1, 2020. A plaintiff shall have the later of the three-year
28 time period under this subdivision or the time period under subdivision (a) as amended by the act

1 that added this subdivision.” These claims of the Plaintiff have not been previously litigated to
2 finality and have been filed (or are still pending) within the timeframe specified *supra*, thus, it is
3 timely under the revised provisions of *Code of Civil Procedure* §340.1(q).

4 41. The Plaintiff is under the age of forty (40) years old at the time of filing of the
5 Complaint, therefore, their action is timely pursuant to *Code of Civil Procedure* §340.1(a).

6 42. The Plaintiff is over the age of forty (40) years old at the time of filing of the
7 Complaint. Since this action is being commenced after the Plaintiff’s 40th birthday, and as set forth
8 more fully *supra*, it is upon information, and therefore belief, that the RELIGIOUS ENTITY
9 DEFENDANTS knew or had reason to know, or were otherwise on notice, of misconduct that
10 created a risk of childhood sexual assault by DOE PERPETRATOR

11 43. Since this action is being commenced after the Plaintiff’s 40th birthday, and as set
12 forth more fully *supra*, it is upon information, and therefore belief, that the RELIGIOUS ENTITY
13 DEFENDANTS failed to take reasonable steps, or to implement reasonable safeguards, to avoid
14 acts of childhood sexual assault, including but not limited to preventing or avoiding placement of
15 the DOE PERPETRATOR in a function or environment in which contact with children was an
16 inherent part of that function or environment.

17 44. Pursuant to *Code of Civil Procedure* §340.1(g)(1), a separate Certificate of Merit
18 was filed by the Plaintiff’s attorney for each defendant in this action.

19 45. Pursuant to *Code of Civil Procedure* §340.1(g)(2), a declaration from a mental
20 healthcare practitioner was filed concurrently with the instant Complaint for the Plaintiff.

21 **PUNITIVE DAMAGES SOUGHT AGAINST RELIGIOUS ENTITY DEFENDANTS AND**
22 **RESERVATION OF RIGHTS**

23 46. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500 are, based on
24 information and belief, religious corporations, organized under the laws of California, and
25 therefore, are afforded the protection of *Code of Civil Procedure* §425.14. Upon such time as
26 appropriate, the Plaintiff expressly reserves the right to file a Motion to Amend the instant
27 Complaint, in order to allege facts sufficient to constitute punitive damages against DEFENDANT
28

1 RELIGIOUS ENTITIES, in accord with evidence that substantiates a finding of the clear and
2 convincing evidentiary requirement of *Civil Code* §3294.

3 **FIRST CAUSE OF ACTION**
4 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE
RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500)

5 47. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
6 paragraphs, as though fully set forth herein.

7 48. Defendants' conduct towards the Plaintiff, as described herein, was outrageous and
8 extreme.

9 49. A reasonable person would not expect or tolerate the DEFENDANT RELIGIOUS
10 ENTITIES and DOES 1 through 500 putting the DOE PERPETRATOR in positions of authority
11 at DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, which enabled the DOE
12 PERPETRATOR to have access to minor children, including the Plaintiff, so that he could commit
13 wrongful sexual acts with them, including the conduct described herein above. The Plaintiff held
14 great trust, faith and confidence in Defendants, which, by virtue of Defendants' wrongful conduct,
15 turned to fear.

16 50. A reasonable person would not expect or tolerate the DEFENDANT RELIGIOUS
17 ENTITIES to be incapable of supervising and preventing employees of Defendants, including the
18 DOE PERPETRATOR, from committing wrongful sexual acts with minor children in their charge,
19 including Plaintiff, or to be incapable of properly supervising the DOE PERPETRATOR to prevent
20 such assault from occurring.

21 51. Defendants' conduct described herein was intentional and malicious and done for
22 the purpose of causing, or with reckless disregard of the rights of the Plaintiff, with the substantial
23 certainty that it would cause Plaintiff and the other children who were enrolled in, participated in,
24 or were members and participants in, activities of their parish and of Defendants' religious,
25 educational, recreational, and social programs, to suffer humiliation, mental anguish and emotional
26 and physical distress.

52. As a result of the above-described conduct, Plaintiff suffered and continues to suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has suffered and continues to suffer and were prevented and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and earning capacity, and have incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

53. As to DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, Plaintiff reserves the right to file a Motion to Amend the complaint, pursuant to *Code of Civil Procedure* §425.14.

SECOND CAUSE OF ACTION
HUMAN TRAFFICKING (*CIVIL CODE* §52.5)
(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE
RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500)

54. Plaintiff repeats, re-alleges and incorporates herein by reference all prior paragraphs, as though fully set forth herein.

55. The Plaintiff, who was a minor when the DOE PERPETRATOR took custody of them, was a victim under *Penal Code* §236.1 (specifically, subsection (a)), and is entitled to bring a claim under *Civil Code* §52.5(a).

56. The Plaintiff is a victim under California *Penal Code* §236.1(a), given the following facts:

- a. The Plaintiff had their personal liberty and/or freedom deprived when, the DOE PERPETRATOR transported them;
- b. The Plaintiff was a minor, therefore was unable to give consent to such acts. Purported consent of a minor, is no basis for a defense under *Penal Code* §236.1(e);
- c. The DOE PERPETRATOR transported the Plaintiff in order to obtain forced, sexual services from the Plaintiff, in a secluded area, which were performed upon the DOE PERPETRATOR;
- d. The Plaintiff, as a minor, did perform forced, sexual services for the DOE PERPETRATOR, after they had been transported. The Plaintiff was a minor at all relevant times and was unable to give valid consent to any of the sex acts that were perpetrated upon them by DOE PERPETRATOR.

1 57. The Defendant RELIGIOUS ENTITY DEFENDANTS, and DOES 1 through 500,
2 having full knowledge of the dangerous and sexually exploitive propensities of the DOE
3 PERPETRATOR, ratified the DOE PERPETRATOR's conduct and are liable pursuant to *C.R. v.*
4 *Tenet Healthcare Corp.* (2009) 169 Cal.App.4th 1094, 1110 ("...an employer may be liable for an
5 employee's act where the employer either authorized the tortious act or subsequently ratified an
6 originally unauthorized tort. [Citations.] The failure to discharge an employee who has committed
7 misconduct may be evidence of ratification. [Citations.] The theory of ratification is generally
8 applied where an employer fails to investigate or respond to charges that an employee committed
9 an intentional tort, such as assault or battery.") Prior to the Plaintiff's transportation by the DOE
10 PERPETRATOR, the DEFENDANT RELIGIOUS ENTITIES knew, or should have known, that
11 the DOE PERPETRATOR was unfit to be around minor children and posed a danger to those
12 children the DOE PERPETRATOR was assigned to care for, or otherwise supervise.

13 58. Furthermore, the RELIGIOUS ENTITY DEFENDANTS, and DOES 1 through 500,
14 were made well aware that the DOE PERPETRATOR was transporting minor students in his
15 vehicle, with no other adults present. Despite having this knowledge, the RELIGIOUS ENTITY
16 DEFENDANTS, and DOES 1 through 100, chose not to discipline, remove, sanction, deter,
17 supervise, or restrict the DOE PERPETRATOR's conduct.

18 59. As a result of the above-described conduct, the Plaintiff suffered and continues to
19 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
20 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life;
21 has suffered and continues to suffer and were prevented and will continue to be prevented from
22 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and
23 earning capacity, and have incurred and will continue to incur expenses for medical and
24 psychological treatment, therapy, and counseling.

25 60. In subjecting Plaintiff to the wrongful treatment herein described, Defendant DOE
26 PERPETRATOR acted willfully and maliciously with the intent to harm Plaintiff, and in conscious
27 disregard of Plaintiff's rights, so as to constitute malice and/or oppression under California *Civil*
28 *Code* section 3294.

61. Plaintiff is therefore entitled, upon proper application to the court, to the recovery of punitive damages, in an amount to be determined by the court, the RELIGIOUS ENTITY DEFENDANTS. Plaintiff reserves his right, pursuant to California *Code of Civil Procedure* § 425.14, to seek leave of court to pursue an award of punitive damages against RELIGIOUS ENTITY DEFENDANTS, in a sum to be shown according to proof.

62. Pursuant to *Civil Code* §52.5(a), the Plaintiff is entitled to recover actual damages, compensatory damages, punitive damages (specified above and in accordance with *Code of Civil Procedure* §425.14), as well as attorneys' fees. Furthermore, pursuant to *Civil Code* §52.5(b), the Plaintiff seeks to recover three (3) times their actual damages against Defendants, and DOES 1 through 500, in addition to the remedies stated in the previous sentence, as their actual damages are far exceed \$10,000.00.

THIRD CAUSE OF ACTION
NEGLIGENCE
(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE
RELIGIOUS ORDER, and DOES 1 through 500)

63. Plaintiff repeats, re-alleges and incorporates herein by reference all prior paragraphs, as though fully set forth herein.

64. As more fully set forth above, the conduct and actions of the DEFENDANT RELIGIOUS ENTITIES, and DOES 1 through 500, served to create an environment in which the DOE PERPETRATOR was afforded years of continuous secluded access to minor children including the Plaintiff, a minor child at the time of their sexual assaults by the DOE PERPETRATOR.

65. As more fully set forth above, Defendants DOE 1, and DOES 1 through 500, inclusive, were aware and/or on notice of the DOE PERPETRATOR's sexual misconduct with minors prior to the first occasion on which Plaintiff was placed in the DOE PERPETRATOR's custody through the acts of Defendants. Accordingly, at the time the DOE PERPETRATOR and Defendants DOE 1, and DOES 1 through 500, inclusive, performed the acts alleged herein, it was or should have been reasonably foreseeable to Defendants that by continuously exposing and making Plaintiff available to the DOE PERPETRATOR, Defendants were placing Plaintiff in grave

1 risk of being sexually assaulted by the DOE PERPETRATOR. By knowingly subjecting Plaintiff
2 to such foreseeable danger, Defendants DOE 1, and DOES 1 through 500, inclusive, were duty-
3 bound to take reasonable steps and implement reasonable safeguards to protect Plaintiff from the
4 DOE PERPETRATOR. Furthermore, as alleged herein, Defendants DOE 1, and DOES 1 through
5 500, inclusive, at all times exercised a sufficient degree of control over the DOE PERPETRATOR's
6 personal and business affairs to prevent the acts of assault by keeping the DOE PERPETRATOR
7 away from Plaintiffs. However, Defendants DOE 1, and DOES 1 through 500, inclusive, failed to
8 take any reasonable steps or implement any reasonable safeguards for Plaintiff's protection
9 whatsoever, and continued to make Plaintiff accessible to the DOE PERPETRATOR for the
10 purposes of sexual assault.

11 **NEGLIGENCE PER SE—PENAL CODE MANDATORY CHILD ABUSE REPORTING**

12 66. Under the Child Abuse and Neglect Reporting Act ("CANRA"), RELIGIOUS
13 ENTITY DEFENDANTS and DOES 1 through 500, inclusive, by and through their agents,
14 servants, volunteers, and/or employees, including priests, were child care custodians and were
15 under a statutory duty to report known or suspected incidents of sexual molestation or abuse of
16 minors to a child protective agency, pursuant to California *Penal Code* § 11166, and/or not to
17 impede the filing of any such report. Furthermore, RELIGIOUS ENTITY DEFENDANTS and
18 DOES 1 through 500 were under a statutory duty to provide their employees with various
19 acknowledgements of reporting requirements under *Penal Code* §11166.5.

20 67. Defendants RELIGIOUS ENTITY DEFENDANTS and DOES 1 through 500,
21 inclusive, knew or should have known that their agent, employee, counselor, advisor and mentor,
22 the DOE PERPETRATOR, had sexually molested, abused or caused touching, battery, harm, and
23 other injuries to minors, including Plaintiff, giving rise to a duty to report such conduct under
24 California *Penal Code* §11166.

25 68. Defendants RELIGIOUS ENTITY DEFENDANTS and DOES 1 through 500,
26 inclusive, knew, or should have known of in the exercise of reasonable diligence, that an undue risk
27 to minors, including the Plaintiff, existed because Defendants DOE 1 did not comply with
28 California's mandatory reporting requirements.

1 69. By failing to report the continuing molestations and assaults, which RELIGIOUS
2 ENTITY DEFENDANTS and DOES 1 through 500, inclusive, knew of or should have known of,
3 and by ignoring the fulfillment of the mandated compliance with the reporting requirements
4 provided under California *Penal Code* § 11166, Defendants DOE 1 and DOES 1 through 500,
5 inclusive, created the risk and danger contemplated by CANRA, and as a result, unreasonably and
6 wrongfully exposed Plaintiff and other minors to sexual molestation and abuse.

7 70. The Plaintiff was a member of the class of persons for whose protection California
8 *Penal Code* § 11166 was specifically adopted to protect.

9 71. Had RELIGIOUS ENTITY DEFENDANTS and DOES 1 through 500, inclusive,
10 adequately reported the molestation of Plaintiff and other minors as required by California *Penal*
11 *Code* § 11166, further harm to Plaintiff and other minors would have been avoided.

12 72. As a proximate result of RELIGIOUS ENTITY DEFENDANTS and DOES 1
13 through 500's, inclusive, failure to follow the mandatory reporting requirements of California *Penal*
14 *Code* § 11166, Defendants DOE 1, and DOES 1 through 500, inclusive, wrongfully denied the
15 Plaintiff and other minors the intervention of child protection services. Such public agencies would
16 have changed the then-existing arrangements and conditions that provided the access and
17 opportunities for the molestation of Plaintiffs by the DOE PERPETRATOR.

18 73. The physical, mental, and emotional damages and injuries resulting from the sexual
19 molestation of Plaintiff by the DOE PERPETRATOR, were the type of occurrence and injuries that
20 the CANRA was designed to prevent.

21 74. As a result, RELIGIOUS ENTITY DEFENDANTS and DOES 1 through 500's,
22 inclusive, failure to comply with the mandatory reporting requirements of California *Penal Code* §
23 11166 also constituted a *per se* breach of Defendants' DOE 1, and DOES 1 through 500's, inclusive
24 duties to Plaintiff.

25 75. As a direct and proximate result of the failure of Defendants DOE 1 and DOES 1
26 through 500, inclusive, to protect Plaintiff from the acts of childhood sexual assault to which they
27 were subjected to by the DOE PERPETRATOR, Plaintiff has suffered the physical injury of sexual
28 assault and has suffered and will continue to suffer severe mental and emotional distress including,

1 but not limited to, great pain of mind and body, shock, emotional distress, physical manifestations
2 of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of
3 enjoyment of life; have suffered and continue to suffer and were prevented and will continue to be
4 prevented from performing daily activities and obtaining the full enjoyment of life; will sustain loss
5 of earnings and earning capacity, and have incurred and will continue to incur expenses for medical
6 and psychological treatment, therapy, and counseling; and loss of past and future earnings and other
7 economic benefits according to proof at the time of trial.

8 **FOURTH CAUSE OF ACTION**
9 **NEGLIGENT SUPERVISION**
10 **(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE**
11 **RELIGIOUS ORDER, and DOES 1 through 500)**

12 76. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
13 paragraphs, as though fully set forth herein.

14 77. By virtue of Plaintiff's special relationship with DEFENDANT RELIGIOUS
15 ENTITIES and DOES 1 through 500, inclusive, and DEFENDANT RELIGIOUS ENTITIES and
16 DOES 1 through 500's, inclusive, relation to the DOE PERPETRATOR, Defendants DOE 1 and
17 DOES 1 through 500, inclusive, owed Plaintiff a duty to provide reasonable supervision of the
18 Plaintiff, to provide reasonable supervision of the DOE PERPETRATOR, to use reasonable care
19 in investigating the DOE PERPETRATOR's background, and to provide adequate warning to the
20 Plaintiff, their families, and other children, of the DOE PERPETRATOR's dangerous propensities
21 and unfitness. Said Defendants, and each of them, further owed Plaintiff a duty to protect against
22 the foreseeable risk of sexual assaults committed upon children, including Plaintiff, during or
23 arising out of those activities sponsored and controlled by Defendants in which Plaintiff was a
24 participant.

25 78. Plaintiff is informed and believe, and on that basis allege, that DEFENDANT
26 RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, by and through their respective
27 agents, servants and employees, knew or should have known of the DOE PERPETRATOR's
28 dangerous and exploitive propensities and/or that the DOE PERPETRATOR was an unfit agent.
Despite such knowledge, DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500,

1 inclusive, negligently failed to supervise the DOE PERPETRATOR in his position of trust and
2 authority as an authority figure and supervisor of children, where they were able to commit
3 wrongful acts against the Plaintiff. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through
4 500, inclusive, failed to provide reasonable supervision of the DOE PERPETRATOR, failed to use
5 reasonable care in investigating the DOE PERPETRATOR and failed to provide adequate warning
6 to Plaintiff of the DOE PERPETRATOR's dangerous propensities and unfitness. DEFENDANT
7 RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, further failed to take reasonable
8 measures to prevent sexual assault, harassment, and molestation of children, including Plaintiff.

9 79. Plaintiff is informed and believe, and on that basis allege, that DEFENDANT
10 RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, were put on notice, and knew or
11 should have known, that the DOE PERPETRATOR had previously engaged and was continuing to
12 engage in unlawful sexual conduct with children and committed other felonies, for his own personal
13 gratification, and that it was, or should have been foreseeable that he was engaging, or would
14 engage in illicit sexual activities with Plaintiff, and others, under the cloak of his authority,
15 confidence, and trust, bestowed upon him through DEFENDANT RELIGIOUS ENTITIES and
16 DOES 1 through 500, inclusive, and each of them.

17 80. Plaintiff is informed and believe, and on that basis alleges, that DEFENDANT
18 RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, were placed on actual or constructive
19 notice that, the DOE PERPETRATOR had assaulted children prior to, and/or during the time he
20 was in contact with the Plaintiffs. Plaintiff is informed, and thereon alleges, that DEFENDANT
21 RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, were informed of sexual assault,
22 harassment and molestations committed by the DOE PERPETRATOR or of conduct that would
23 put a reasonable person on notice of such propensity to assault, harassment and molestation.

24 81. Even though DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500,
25 inclusive, knew or should have known of these activities by the DOE PERPETRATOR,
26 DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, did nothing to
27 investigate, supervise or monitor the DOE PERPETRATOR to ensure the safety of the guests.
28

1 82. As an institution entrusted with the care of minors, where staff, employees, agents,
2 and management, such as the DOE PERPETRATOR were placed in contact with minors,
3 DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's expressly and implicitly
4 represented that these individuals, including the DOE PERPETRATOR, were not a sexual threat
5 to children and others who would fall under the DOE PERPETRATOR 's influence, control,
6 direction, and guidance.

7 83. Defendants DOE 1, and DOES 1 through 500, inclusive, negligently failed to
8 supervise the DOE PERPETRATOR in his positions of trust and authority as an employee, agent,
9 counselor and mentor, and/or other authority figure, where the DOE PERPETRATOR was able to
10 commit wrongful acts against the Plaintiff. Defendants DOE 1, and DOES 1 through 500, inclusive,
11 failed to provide reasonable supervision of the DOE PERPETRATOR. Defendants DOE 1 and
12 DOES 1 through 500 further failed to take reasonable measures to prevent sexual harassment,
13 molestation and assault of minors, including the Plaintiff.

14 84. At no time during the periods of time alleged did DEFENDANT RELIGIOUS
15 ENTITIES and DOES 1 through 500, inclusive, have in place a system or procedure to reasonably
16 investigate, supervise and monitor individuals in contact with minor children, including the DOE
17 PERPETRATOR, to prevent pre-sexual grooming and sexual harassment, molestation and assault
18 of children, nor did they implement a system or procedure to oversee or monitor conduct toward
19 minors, students and others in DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's
20 care.

21 85. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, were
22 or should have known to be aware and understand how vulnerable children were to sexual
23 harassment, molestation and assault by mentors, advisors, and other persons of authority within
24 DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive.

25 86. Defendants DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's,
26 inclusive, conduct was a breach of their duties to the Plaintiff.

27 87. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive,
28 breached their duty to the Plaintiff by, *inter alia*, failing to adequately monitor and supervise the

1 DOE PERPETRATOR and stopping the DOE PERPETRATOR from committing wrongful sexual
2 acts with minors including the Plaintiff. This belief is founded on the fact that employees and staff
3 of DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, including had
4 suspected the assault was occurring at the time, and failed to investigate into the matter further.
5 Based on these facts, DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive,
6 knew or should have known of the DOE PERPETRATOR 's incapacity to supervise and stop
7 employees of DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive from
8 committing wrongful sexual acts with minors.

9 88. As a direct and proximate result of the failures of DEFENDANT RELIGIOUS
10 ENTITIES and DOES 1 through 500, inclusive, Plaintiff has suffered and will continue to suffer
11 the physical injury of childhood sexual assault, severe mental and emotional distress including, but
12 not limited to, great pain of mind and body, shock, emotional distress, physical manifestations of
13 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of
14 enjoyment of life; have suffered and continue to suffer and were prevented and will continue to be
15 prevented from performing daily activities and obtaining the full enjoyment of life; will sustain loss
16 of earnings and earning capacity, and have incurred and will continue to incur expenses for medical
17 and psychological treatment, therapy, and counseling; and loss of past and future earnings and other
18 economic benefits according to proof at the time of trial.

19 **FIFTH CAUSE OF ACTION**
20 **NEGLIGENT RETENTION/HIRING**
(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE
RELIGIOUS ORDER, and DOES 1 through 500)

21 89. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
22 paragraphs, as though fully set forth herein.

23 90. By virtue of Plaintiff's special relationship with Defendants, inclusive and each of
24 them, and DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive, relation
25 to the DOE PERPETRATOR, DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500,
26 inclusive, owed Plaintiff a duty to not hire and/or retain the DOE PERPETRATOR, given his
27 dangerous and exploitive propensities, which DEFENDANT RELIGIOUS ENTITIES and DOES
28

1 1 through 500, inclusive, knew or should have known had they engaged in a meaningful and
2 adequate investigation of his background prior to his hiring.

3 91. As an institution entrusted with the care of minors, where staff, employees, agents,
4 and management, such as the DOE PERPETRATOR was placed in contact with minors,
5 DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive, expressly and
6 implicitly represented that these individuals, including the DOE PERPETRATOR, were not a
7 sexual threat to children and others who would fall under the DOE PERPETRATOR 's influence,
8 control, direction, and guidance.

9 92. Plaintiff is informed and believe, and on that basis allege, that at no time during the
10 periods of time alleged did DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's,
11 inclusive, have in place a system or procedure to reasonably investigate, supervise and/or monitor
12 those individuals in direct contact with children, including the DOE PERPETRATOR, to prevent
13 pre-sexual grooming and/or sexual harassment, molestation and assault of parishioners, nor did
14 they implement a system or procedure to oversee or monitor conduct toward patrons and others in
15 DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive, care.

16 93. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, and
17 each of them were or should have been aware and understood how vulnerable minor children were
18 to sexual assault, harassment and molestation by persons of authority, including the DOE
19 PERPETRATOR, within the control of DEFENDANT RELIGIOUS ENTITIES and DOES 1
20 through 500, inclusive.

21 94. Plaintiffs are informed and believe, and on that basis allege, other children and/or
22 employees of DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive,
23 complained of the DOE PERPETRATOR's sexual improprieties prior to the sexual assault of the
24 Plaintiff. Either DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive,
25 knew, or at the very least should have known of the DOE PERPETRATOR's prior history of sexual
26 misconduct with minors prior to Plaintiff's assaults.

27 95. Plaintiff is informed, and believes, and on that basis alleges, that the DEFENDANT
28 RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, were put on notice, and should have

1 known that the DOE PERPETRATOR had previously engaged and continued to engage in unlawful
2 sexual conduct with patrons and other felonies, for his own personal gratification, and that it was,
3 or should have been foreseeable that he was engaging, or would engage in illicit sexual activities
4 with Plaintiff, and others, under the cloak of his authority, confidence, and trust, bestowed upon
5 him through DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive.

6 96. Plaintiff is informed and believes, and on that basis alleges that DEFENDANT
7 RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive, were placed on actual and/or
8 constructive notice that the DOE PERPETRATOR had abused, harassed, molested and/or was
9 molesting minor children, both before his sexual assault, molestation and harassment of the
10 Plaintiff, and during that same period. Plaintiff is informed, and thereon alleges, that other third
11 parties, patrons, and/or law enforcement officials informed DEFENDANT RELIGIOUS
12 ENTITIES and DOES 1 through 500, inclusive, of inappropriate conduct and molestations
13 committed by the DOE PERPETRATOR.

14 97. Even though DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500,
15 inclusive, knew or should have known of these activities by the DOE PERPETRATOR, Plaintiff is
16 informed that DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, failed
17 to use reasonable care in investigating the DOE PERPETRATOR and did nothing to investigate,
18 supervise or monitor the DOE PERPETRATOR to ensure the safety of the other minor children in
19 his charge, including the Plaintiff.

20 98. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500's, inclusive,
21 conduct was a breach of their duties to the Plaintiff.

22 99. As a direct and proximate result of the failures of DEFENDANT RELIGIOUS
23 ENTITIES and DOES 1 through 500, inclusive, Plaintiffs have suffered and will continue to suffer
24 the physical injury of sexual assault, and severe mental and emotional distress including, but not
25 limited to, great pain of mind and body, shock, emotional distress, physical manifestations of
26 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of
27 enjoyment of life; have suffered and continue to suffer and were prevented and will continue to be
28 prevented from performing daily activities and obtaining the full enjoyment of life; will sustain loss

1 of earnings and earning capacity, and have incurred and will continue to incur expenses for medical
2 and psychological treatment, therapy, and counseling; and loss of past and future earnings and other
3 economic benefits according to proof at the time of trial.

4 **SIXTH CAUSE OF ACTION**
5 **NEGLIGENT FAILURE TO TRAIN, WARN OR EDUCATE**
6 **(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE**
7 **RELIGIOUS ORDER, and DOES 1 through 500)**

8 100. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
9 paragraphs, as though fully set forth herein.

10 101. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive owed
11 Plaintiff a duty to take reasonable protective measures to protect Plaintiff and other minor children
12 in their charge from the risk of sexual assault, harassment and molestation by the DOE
13 PERPETRATOR by properly warning, training or educating the Plaintiff and other minors about
14 how to avoid such a risk.

15 102. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive,
16 breached their duty to take reasonable protective measures to protect Plaintiff and other minor
17 children in their charge, from the risk of sexual assault, harassment and molestation by the DOE
18 PERPETRATOR such as the failure to properly warn, train or educate Plaintiff and other minor
19 children in their charge about how to avoid such a risk.

20 103. Defendants breached their duty to take reasonable protective measures to protect
21 Plaintiff and other minor children in their charge from the risk of sexual harassment, molestation
22 and assault by the DOE PERPETRATOR, by failing to supervising and/or stop employees of
23 DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive, including the DOE
24 PERPETRATOR from committing wrongful sexual acts with minor children, including Plaintiff.

25 104. As a direct and proximate result of the failures of DEFENDANT RELIGIOUS
26 ENTITIES and DOES 1 through 500, inclusive, Plaintiff has suffered and will continue to suffer
27 severe mental and emotional distress including, but not limited to, great pain of mind and body,
28 shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of
self-esteem, disgrace, humiliation, and loss of enjoyment of life; have suffered and continue to

1 suffer and were prevented and will continue to be prevented from performing daily activities and
2 obtaining the full enjoyment of life; will sustain loss of earnings and earning capacity, and have
3 incurred and will continue to incur expenses for medical and psychological treatment, therapy, and
4 counseling; and loss of past and future earnings and other economic benefits according to proof at
5 the time of trial.

6 **SEVENTH CAUSE OF ACTION**
7 **BREACH OF FIDUCIARY DUTY**
8 **(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE**
9 **RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500)**

10 105. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
11 paragraphs, as though fully set forth herein.

12 106. As set forth more fully above, DEFENDANT RELIGIOUS ENTITIES and DOES
13 1 through 500, inclusive, in concert with the DOE PERPETRATOR, recruited, enticed, and
14 encouraged Plaintiff and Plaintiff's family to give their trust and confidence to Defendants and the
15 DOE PERPETRATOR so that Plaintiffs could be taken from their family's care and supervision
16 and placed under the care and supervision of Defendants and the DOE PERPETRATOR. In so
17 doing, Defendants, inclusive, entered into a fiduciary relationship with Plaintiff whereby
18 Defendants owed Plaintiff an *in loco parentis* duty of care to take all reasonable steps and
19 implement all reasonable safeguards to protect Plaintiff while they were in the custody of
20 Defendants and/or the DOE PERPETRATOR.

21 107. The Plaintiff and other children involved in activities under the control and
22 supervision of DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, agreed to place
23 their trust and confidence in Defendants, inclusive, in the expectation that Defendants would
24 properly supervise Plaintiff and other children similarly placed, regulate their activities and
25 behavior, and ensure their safety. Further, Plaintiff, the Plaintiff's family and other children
26 agreed to this because they believed in the integrity of Defendants, inclusive, and therefore felt
27 comfortable in entrusting the minor Plaintiff to the care and custody of Defendants.

28 108. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, inclusive,
breached their duty to Plaintiff by failing to take any reasonable steps or implement any reasonable

1 safeguards to protect Plaintiff from the DOE PERPETRATOR and by allowing Plaintiff to be
2 sexually assaulted by the DOE PERPETRATOR.

3 109. As a direct and proximate result of the failures of DEFENDANT RELIGIOUS
4 ENTITIES and DOES 1 through 500, Plaintiff has suffered and will continue to suffer the physical
5 injury of sexual assault, severe mental and emotional distress including, but not limited to, great
6 pain of mind and body, shock, emotional distress, physical manifestations of emotional distress,
7 embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; have
8 suffered and continue to suffer and were prevented and will continue to be prevented from
9 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings
10 and earning capacity, and have incurred and will continue to incur expenses for medical and
11 psychological treatment, therapy, and counseling; and loss of past and future earnings and other
12 economic benefits according to proof at the time of trial.

13 110. As to DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, Plaintiff
14 reserves the right to file a Motion to Amend the complaint, pursuant to *Code of Civil Procedure*
15 §425.14.

16 **EIGHTH CAUSE OF ACTION**
17 **CONSTRUCTIVE FRAUD (CIVIL CODE §1573)**
18 **(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE**
19 **RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500)**

20 111. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
21 paragraphs, as though fully set forth herein.

22 112. By holding the DOE PERPETRATOR out as an agent of Defendants, and by
23 allowing him to undertake the educational, religious, and social instruction and accompanying
24 custody and control of minor children such as Plaintiff, Defendants entered into a confidential,
25 fiduciary and special relationship with Plaintiff.

26 113. By holding themselves out as qualified institutions for the safety and supervision of
27 children, and by undertaking to provide for the wellness, spiritual guidance and mentorship of
28 Plaintiff and other minors, Defendants entered into a confidential, fiduciary and special relationship
with Plaintiff.

1 114. Defendants breached their confidential, fiduciary duty and special duties to
2 Plaintiffs by the wrongful and negligent conduct described above and incorporated into this cause
3 of action, and in so doing, gained an advantage over Plaintiffs in matters relating to Plaintiffs'
4 safety, security and health. In breaching such duties as alleged, Defendants were able to sustain
5 their status as institutions of high moral repute, and preserve their reputation, all at the expense of
6 Plaintiffs' further injury and in violation of Defendants' mandatory duties.

7 115. By virtue of their confidential, fiduciary and special relationship with Plaintiff,
8 Defendants owed Plaintiff a duty to:

- 9 a. Investigate or otherwise confirm or deny such claims of sexual assault;
- 10 b. Reveal such facts to Plaintiff, Plaintiff's families and caretakers, the
community at large, and law enforcement agencies;
- 11 c. Refuse to place the DOE PERPETRATOR and other molesters in positions
of trust and authority within Defendants' institutions;
- 12 d. Refuse to hold out the DOE PERPETRATOR and other molesters to the
13 public, the community, minors, parents and law enforcement agencies as
being in good standing and, trustworthy in keeping with his and their
14 position as a teacher, counselor, spiritual advisor, managing administrator
and authority figure;
- 15 e. Refuse to assign the DOE PERPETRATOR and other molesters to positions
of power within the Defendants' institutions and over minors; and
- 16 f. Disclose to Plaintiff, their families, the public, the Defendants' community,
17 minors, and law enforcement agencies the wrongful, tortious, and sexually
exploitive acts that DOE PERPETRATOR had engaged in with children;

18 116. Defendants' breach of their respective duties included:

- 19 a. Not making reasonable investigations of the DOE PERPETRATOR;
- 20 b. Issuing no warnings about the DOE PERPETRATOR;
- 21 c. Permitting the DOE PERPETRATOR to routinely be alone with and in
control of minors, unsupervised;
- 22 d. Not adopting a policy to prevent the DOE PERPETRATOR from routinely
having minors in his unsupervised control;
- 23 e. Making no reports of any allegations of the DOE PERPETRATOR's assault
of minors prior to or during his employment at Defendants; and
- 24 f. Assigning and continuing to assign the DOE PERPETRATOR to duties
25 which placed him in positions of authority and trust over minors, positions
in which the DOE PERPETRATOR could easily isolate and sexually
26 assault minors.

27 117. At the time that Defendants engaged in such suppression and concealment of acts,
28 such acts were done for the purpose of causing Plaintiff to forbear on their rights.

1 118. Defendants' misconduct did reasonably cause Plaintiff to forbear on their rights.

2 119. The misrepresentations, suppressions and concealment of facts by Defendants were
3 intended to and were likely to mislead Plaintiff and others to believe that Defendants had no
4 knowledge of any charges against the DOE PERPETRATOR, or that there were no other charges
5 of unlawful or sexual misconduct against the DOE PERPETRATOR or others and that there was
6 no need for them to take further action or precaution.

7 120. The misrepresentations, suppressions and concealment of facts by Defendants was
8 likely to mislead Plaintiff and others to believe that Defendants had no knowledge of the fact that
9 the DOE PERPETRATOR was a molester and was known to commit wrongful sexual acts with
10 minors, including Plaintiff.

11 121. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500 knew or should
12 have known at the time they suppressed and concealed the true facts regarding others' sexual
13 molestations, that the resulting impressions were misleading.

14 122. DEFENDANT RELIGIOUS ENTITIES suppressed and concealed the true facts
15 regarding the DOE PERPETRATOR with the purpose of: preventing Plaintiff, Plaintiff's parents
16 and family, and others, from learning that the DOE PERPETRATOR and others had been and were
17 continuing to sexually harass, molest and assault minors and others under the DOE
18 PERPETRATOR's and Defendants' control, direction, and guidance, with complete impunity;
19 inducing people, including Plaintiff and other benefactors and donors to participate and financially
20 support Defendants' and other enterprises of Defendants; preventing further reports and outside
21 investigations into the DOE PERPETRATOR's and Defendants' conduct; preventing discovery of
22 Defendants' own conduct; avoiding damage to the reputations of Defendants; protecting
23 Defendants' power and status in the community and the academic community; avoiding damage to
24 the reputation of Defendants, or Defendants' institutions; and avoiding the civil and criminal
25 liability of Defendants, of the DOE PERPETRATOR, and of others.

26 123. At all times mentioned herein, Defendants, and in particular the DOE
27 PERPETRATOR and DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, with
28 knowledge of the tortious nature of their own and the DOE PERPETRATOR's conduct, knowingly

1 conspired and gave each other substantial assistance to perpetrate the misrepresentations, fraud and
2 deceit alleged herein—covering up the past allegations of sexual misconduct lodged against the
3 DOE PERPETRATOR, and allowing the DOE PERPETRATOR to remain in his position as a
4 mentor, spiritual leader, and supervisor of children, so they could maintain their reputations and
5 continue to make a profit.

6 124. Plaintiff and others were misled by Defendants' suppressions and concealment of
7 facts, and in reliance thereon, were induced to act or induced not to act, exactly as intended by
8 Defendants. Specifically, Plaintiff and Plaintiff's family were induced to believe that there were no
9 allegations of criminal or sexual assault against the DOE PERPETRATOR and that he was safe to
10 be around children. Had Plaintiff and their families, and others, known the true facts about the DOE
11 PERPETRATOR, they would have not participated further in activities of DEFENDANT
12 RELIGIOUS ENTITIES and DOES 1 through 500, or continued to financially support Defendants'
13 activities. They would have reported the matters to the proper authorities, to other minors and their
14 parents so as to prevent future recurrences; they would not have allowed children, including
15 Plaintiff, to be alone with, or have any relationship with the DOE PERPETRATOR; they would
16 not have allowed children, including Plaintiff, to attend or be under the control of Defendants; they
17 would have undertaken their own investigations which would have led to discovery of the true
18 facts; and they would have sought psychological counseling for Plaintiff, and for other children
19 molested and assaulted by the DOE PERPETRATOR.

20 125. By giving the DOE PERPETRATOR the position of spiritual guide, priest,
21 confidant, and trusted individual, Defendants impliedly represented that the DOE PERPETRATOR
22 was safe and morally fit to give children direction and guidance.

23 126. When Defendants made these affirmative or implied representations and non-
24 disclosures of material facts, Defendants knew or should have known that the facts were otherwise.
25 Defendants knowingly and intentionally suppressed the material facts that the DOE
26 PERPETRATOR had on numerous, prior occasions sexually, physically, and mentally assaulted
27 minors of Defendants, including Plaintiff, and knew of or learned of conduct, or should have known
28 of conduct by the DOE PERPETRATOR which placed Defendants on notice that the DOE

1 PERPETRATOR had previously been suspected of felonies, including unlawful sexual conduct
2 with minors, and was likely abusing children.

3 127. Because of Plaintiff's young age, and because of the status of the DOE
4 PERPETRATOR as an authority figure to Plaintiff, Plaintiff was vulnerable to the DOE
5 PERPETRATOR. The DOE PERPETRATOR sought Plaintiff out and was empowered by and
6 accepted Plaintiff's vulnerability. Plaintiff's vulnerability also prevented Plaintiff from effectively
7 protecting themselves from the sexual advances of the DOE PERPETRATOR.

8 128. Defendants had the duty to obtain and disclose information relating to sexual
9 misconduct of the DOE PERPETRATOR.

10 129. Defendants misrepresented, concealed or failed to disclose information relating to
11 sexual misconduct of the DOE PERPETRATOR.

12 130. Defendants knew that they had misrepresented, concealed or failed to disclose
13 information related to sexual misconduct of the DOE PERPETRATOR.

14 131. Plaintiff justifiably relied upon Defendants for information relating to sexual
15 misconduct of the DOE PERPETRATOR.

16 132. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, and the DOE
17 PERPETRATOR, in concert with each other and with the intent to conceal and defraud, conspired
18 and came to a meeting of the minds whereby they would misrepresent, conceal or fail to disclose
19 information relating to the sexual misconduct of the DOE PERPETRATOR, the inability of
20 Defendants to supervise or stop the DOE PERPETRATOR from sexually harassing, molesting and
21 abusing Plaintiff, and their own failure to properly investigate, supervise and monitor his conduct
22 with minor children.

23 133. By so concealing, Defendants committed at least one act in furtherance of the
24 conspiracy.

25 134. As a direct and proximate result of the failures of DEFENDANT RELIGIOUS
26 ENTITIES and DOES 1 through 500, inclusive, Plaintiff has suffered and will continue to suffer
27 the physical injury of sexual assault, severe mental and emotional distress including, but not limited
28 to, great pain of mind and body, shock, emotional distress, physical manifestations of emotional

1 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life;
2 have suffered and continue to suffer and were prevented and will continue to be prevented from
3 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings
4 and earning capacity, and have incurred and will continue to incur expenses for medical and
5 psychological treatment, therapy, and counseling; and loss of past and future earnings and other
6 economic benefits according to proof at the time of trial.

7 135. In addition, when Plaintiff finally discovered the fraud of Defendants, and
8 continuing thereafter, Plaintiff experienced recurrences of the above-described injuries. In addition,
9 when Plaintiff finally discovered the fraud of Defendants, and continuing thereafter, Plaintiff
10 experienced extreme and severe mental anguish and emotional distress that Plaintiff had been the
11 victim of Defendants' fraud; that Plaintiff had not been able to help other minors being molested
12 because of the fraud, and that Plaintiff had not been able because of the fraud to receive timely
13 medical treatment needed to deal with the problems Plaintiff had suffered and continues to suffer as
14 a result of the sexual harassment, molestation and assault.

15 136. As to DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, Plaintiff
16 reserves the right to file a Motion to Amend the complaint, pursuant to *Code of Civil Procedure*
17 §425.14.

18 **NINTH CAUSE OF ACTION**
19 **SEXUAL HARASSMENT (CIVIL CODE §51.9)**
20 **(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE**
21 **RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500)**

22 137. Plaintiff repeats, re-alleges and incorporates herein by reference all prior
23 paragraphs, as though fully set forth herein.

24 138. During Plaintiff's time as a minor at DEFENDANT RELIGIOUS ENTITIES and
25 DOES 1 through 500, the DOE PERPETRATOR intentionally, recklessly and wantonly made
26 sexual advances, solicitations, requests, demands for sexual compliance of a hostile nature based
27 on Plaintiff's gender that were unwelcome, pervasive and severe, including but not limited to the
28 DOE PERPETRATOR, all under the supervision of Defendants, who were acting in the course and

1 scope of their agency with Defendants and each of them. The sexual harassment of each Plaintiff
2 is detailed *supra*.

3 139. The incidents of assault outlined herein above took place while Plaintiff was under
4 the control of Defendants, as well as the staff of DEFENDANT RELIGIOUS ENTITIES and DOES
5 1 through 500, in their capacity and position as teachers, spiritual advisors, counselors, mentors,
6 supervisors and administrators at DEFENDANT RELIGIOUS ENTITIES and DOES 1 through
7 500 and while acting specifically on behalf of Defendants.

8 140. During Plaintiff's time as a minor at DEFENDANT RELIGIOUS ENTITIES and
9 DOES 1 through 500, the DOE PERPETRATOR intentionally, recklessly and wantonly did acts
10 which resulted in harmful and offensive contact with intimate parts of Plaintiff's persons, including
11 but not limited to, using his position of authority and age to force Plaintiff to give into the DOE
12 PERPETRATOR's sexual suggestions.

13 141. Because of Plaintiff's relationship with DEFENDANT RELIGIOUS ENTITIES and
14 DOES 1 through 500, the DOE PERPETRATOR, and Plaintiff's young age as a minor, Plaintiff
15 was unable to easily terminate the relationship held with the Defendants.

16 142. Because of the DOE PERPETRATOR's age and position of authority, physical
17 seclusion of the Plaintiff, Plaintiff's mental and emotional state, and Plaintiff's young age under
18 the age of consent, Plaintiff was unable to, and did not, give meaningful consent to such acts.

19 143. Even though the Defendants knew or should have known of these activities by the
20 DOE PERPETRATOR, Defendants did nothing to investigate, supervise or monitor the DOE
21 PERPETRATOR to ensure the safety of the minor children.

22 144. Because of Plaintiff's relationship with Defendants, as a minor child, parishioner,
23 student and/or altar server with DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500,
24 and Plaintiff's young age as a minor child, Plaintiff was unable to easily terminate the priest-
25 parishioner relationship with the DOE PERPETRATOR, DEFENDANT RELIGIOUS ENTITIES
26 and DOES 1 through 500.

27 145. A corporation is a "person" within meaning of *Civil Code* section 51.9, which
28 subjects persons to liability for sexual harassment within a business, service or professional

1 relationship, and such an entity defendant may be held liable under this statute for the acts of its
2 employees. *C.R. v. Tenet Healthcare Corp.*, (2009) 169 Cal.App.4th 1094. Further, principles of
3 ratification apply when the principal ratifies the agent's originally unauthorized harassment, as is
4 alleged to have occurred herein.

5 146. DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500 ratified the
6 sexual misconduct of the DOE PERPETRATOR.

7 147. Defendants' conduct (and the conduct of their agents) was a breach of their duties to
8 Plaintiff.

9 148. As a direct and proximate result of the failures of Defendants, inclusive, Plaintiff
10 has suffered and will continue to suffer the physical injury of sexual assault, severe mental and
11 emotional distress including, but not limited to, great pain of mind and body, shock, emotional
12 distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem,
13 disgrace, humiliation, and loss of enjoyment of life; have suffered and continue to suffer and were
14 prevented and will continue to be prevented from performing daily activities and obtaining the full
15 enjoyment of life; will sustain loss of earnings and earning capacity, and have incurred and will
16 continue to incur expenses for medical and psychological treatment, therapy, and counseling; and
17 loss of past and future earnings and other economic benefits according to proof at the time of trial.

18 149. As to DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, Plaintiff
19 reserves the right to file a Motion to Amend the complaint for this cause of action for Punitive
20 Damages, pursuant to *Code of Civil Procedure* §425.14.

21 150. Plaintiff seeks attorneys' fees pursuant to *Civil Code* §52, with respect to their claim
22 being made under §51.9, as an available remedy.

23 **TENTH CAUSE OF ACTION**

Fraudulent Transfer

24 **(Against Defendant DOE ARCHDIOCESE, Defendant DOE DIOCESE,**
25 **Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER,**
and Defendant DOES 1 through 500)

26 151. Plaintiff(s) repeats, re-alleges and incorporates herein by reference all prior
27 paragraphs, as though fully set forth herein.
28

1 152. During the period of time when Defendant DOE ARCHDIOCESE, Defendant DOE
2 DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and Defendant
3 DOES 1 through 500, committed acts of misconduct resulting in Defendant PERPETRATOR's
4 childhood sexual assault of Plaintiff(s), Defendant DOE ARCHDIOCESE, Defendant DOE
5 DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and Defendant
6 DOES 1 through 500, owned, operated and or controlled financial assets.

7 153. After the period of time when Defendant DOE ARCHDIOCESE, Defendant DOE
8 DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and Defendant
9 DOES 1 through 500 committed acts of misconduct resulting in Defendant PERPETRATOR's
10 childhood sexual assault of Plaintiff(s), Defendant DOE ARCHDIOCESE, Defendant DOE
11 DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and Defendant
12 DOES 1 through 500, transferred, (in whole and or in part), interests in financial assets ("Transfer
13 of Asset(s)").

14 154. Plaintiff(s) is informed and believes that Defendant DOE ARCHDIOCESE,
15 Defendant DOE DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and
16 Defendant DOES 1 through 500, did not receive reasonably equivalent value for the Transfer of
17 Asset(s).

18 155. At the time of said Transfer of Asset(s), Defendant DOE ARCHDIOCESE,
19 Defendant DOE DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and
20 Defendant DOES 1 through 500, knew that Plaintiff(s), as a survivor of childhood sexual assault
21 committed by Defendant PERPETRATOR, was and is a creditor.

22 156. Notwithstanding this knowledge, Defendant DOE ARCHDIOCESE, Defendant
23 DOE DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and Defendant
24 DOES 1 through 500 intentionally transferred the interests in financial assets with the actual intent
25 to prevent Plaintiff(s) from collecting from said assets after the Transfer of Asset(s) was complete.

26 157. By reason of the foregoing, the Transfer of Asset(s) is voidable pursuant to
27 California *Civil Code* §§ 3439.04(a)(1) and (2) and § 3439.05, and § 3439.07. Pursuant to
28 California *Civil Code* § 3439.07, Plaintiff(s) request:

- a. a judgment avoiding the Transfer of Asset(s); and/or
- b. a money judgment against Defendant DOE ARCHDIOCESE, Defendant DOE DIOCESE, Defendant DOE PARISH, Defendant DOE RELIGIOUS ORDER, and Defendant DOES 1 through 500 for the value of the Transfer of Asset(s).

158. The recipient(s) of said Transfer of Asset(s), is not yet known by Plaintiff(s). Plaintiff(s) will seek to amend the Complaint to allege their true names and capacities when such have been ascertained.

ELEVENTH CAUSE OF ACTION
SEXUAL BATTERY
(Against Defendant DOE PERPETRATOR only)

159. Plaintiff re-alleges and incorporates by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

160. During Plaintiff's time at DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500, the DOE PERPETRATOR intentionally, recklessly and wantonly did acts which were intended to, and did result in harmful and offensive contact with intimate parts of Plaintiff's person. Plaintiff was subjected to numerous instances of sexual assault by the DOE PERPETRATOR, during Plaintiff's time as a minor with DEFENDANT RELIGIOUS ENTITIES and DOES 1 through 500.

161. The DOE PERPETRATOR did the aforementioned acts with the intent to cause a harmful or offensive contact with an intimate part of Plaintiff's person and would offend a reasonable sense of personal dignity. Further, said acts did cause a harmful or offensive contact with an intimate part of Plaintiff's person that would offend a reasonable sense of personal dignity.

162. Because of the DOE PERPETRATOR's position of authority over Plaintiff, and Plaintiff's mental and emotional state, and Plaintiff's young age under the age of consent, Plaintiff was unable to, and did not, give meaningful consent to such acts.

163. As a direct, legal, and proximate result of the acts of the DOE PERPETRATOR, Plaintiff sustained serious and permanent injuries to his person, all of his damage in an amount to be shown according to proof and within the jurisdiction of the Court.

164. As a direct result of the sexual battery by the DOE PERPETRATOR, Plaintiff has difficulty in reasonably or meaningfully interacting with others, including those in positions of

1 authority over Plaintiff including teachers, and supervisors, and in intimate, confidential and
2 familial relationships, due to the trauma of childhood sexual assault inflicted upon him by
3 Defendants. This inability to interact creates conflict with Plaintiff's values of trust and confidence
4 in others, and has caused Plaintiff substantial emotional distress, anxiety, nervousness, anger and
5 fear. As a direct result of the molestation by the DOE PERPETRATOR, Plaintiff has had issues
6 with his personal life, such as issues with trust and control. These feelings have caused Plaintiff
7 substantial emotional distress, guilt, anxiety, nervousness and fear.

8 165. In subjecting the Plaintiff to the wrongful treatment herein described, the DOE
9 PERPETRATOR, acted willfully and maliciously with the intent to harm Plaintiff, and in conscious
10 disregard of Plaintiff's rights, so as to constitute malice and oppression under California *Civil Code*
11 section 3294. Plaintiff is therefore entitled to the recovery of punitive damages, in an amount to be
12 determined by the court, against the DOE PERPETRATOR, in a sum to be shown according to
13 proof.

14 **TWELFTH CAUSE OF ACTION**
15 **SEXUAL ASSAULT**
16 **(Against Defendant DOE PERPETRATOR only)**

17 166. Plaintiff re-alleges and incorporates by reference herein each and every allegation
18 contained herein above as though fully set forth and brought in this cause of action.

19 167. The DOE PERPETRATOR, in doing the things herein alleged, including intending
20 to subject Plaintiff to numerous instances of sexual abuse and molestation, intended to cause
21 harmful or offensive contact with Plaintiff's person, or intended to put Plaintiff in imminent
22 apprehension of such contact.

23 168. In doing the things herein alleged, Plaintiff was put in imminent apprehension of a
24 harmful or offensive contact by the DOE PERPETRATOR, and actually believed the DOE
25 PERPETRATOR had the ability to make harmful or offensive contact with Plaintiff's person.

26 169. Plaintiff did not consent to the DOE PERPETRATOR intended harmful or offensive
27 contact with Plaintiff's person, or intent to put Plaintiff in imminent apprehension of such contact.
28 Additionally, because Plaintiff was a minor during the time herein alleged, they lacked the ability
to consent to sexual contact with any person.

1 170. In doing the things herein alleged, the DOE PERPETRATOR violated Plaintiff's
2 right, pursuant to *Civil Code* section 43, of protection from bodily restraint or harm, and from
3 personal insult. In doing the things herein alleged, the DOE PERPETRATOR violated his duty,
4 pursuant to *Civil Code* section 1708, to abstain from injuring the person of Plaintiff or infringing
5 upon his rights.

6 171. As a result of the above-described conduct, Plaintiff has suffered and continues to
7 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
8 distress including embarrassment, loss of self-esteem, disgrace, humiliations, and loss of enjoyment
9 of life; has suffered and continues to suffer and was prevented and will continue to be prevented
10 from performing daily activities and obtaining the full enjoyment of life; will sustain loss of
11 earnings and earning capacity, and/or has incurred and will continue to incur expenses for medical
12 and psychological treatment, therapy, and counseling.

13 172. Plaintiff is informed and based thereon alleges that the conduct of the DOE
14 PERPETRATOR was oppressive, malicious and despicable in that it was intentional and done in
15 conscious disregard for the rights and safety of others, and were carried out with a conscious
16 disregard of her right to be free from such tortious behavior, such as to constitute oppression, fraud
17 or malice pursuant to California *Civil Code* section 3294, entitling Plaintiff to punitive damages
18 against the DOE PERPETRATOR in an amount appropriate to punish and set an example of the
19 DOE PERPETRATOR.

20 **THIRTEENTH CAUSE OF ACTION**
21 **GENDER VIOLENCE (CIVIL CODE §52.4)**
22 **(Against Defendant DOE PERPETRATOR only)**

23 173. Plaintiff re-alleges and incorporates by reference herein each and every allegation
24 contained herein above as though fully set forth and brought in this cause of action.

25 174. The DOE PERPETRATOR's acts committed against Plaintiff, as alleged herein,
26 including the sexual harassment, molestation and assault of the minor Plaintiff constitute gender
27 violence and a form of sex discrimination in that one or more of Defendants' acts would constitute
28 a criminal offense under state law that has an element the use, attempted use, or threatened use of
physical force against the person of another, committed at least in part based on the gender of the

1 victim, whether or not those acts have resulted in criminal complaints, charges, prosecution, or
2 convictions.

3 175. The DOE PERPETRATOR acts committed against Plaintiff, as alleged herein,
4 including the sexual harassment, molestation and assault of the minor Plaintiff constitute gender
5 violence and a form of sex discrimination in that the DOE PERPETRATOR conduct caused a
6 physical intrusion or physical invasion of a sexual nature upon Plaintiff under coercive conditions,
7 whether or not those acts have resulted in criminal complaints, charges, prosecution, or conviction.

8 176. As a proximate result of the DOE PERPETRATOR's acts, Plaintiff is entitled to
9 actual damages, compensatory damages, punitive damages, injunctive relief, any combination of
10 those, or any other appropriate relief. Plaintiff is also entitled to an award of attorney's fees and
11 costs pursuant to *Civil Code* § 52.4, against the DOE PERPETRATOR

12 **FOURTEENTH CAUSE OF ACTION**
13 **VIOLATION OF *PENAL CODE* § 288(a)**
14 **(Against Defendant DOE PERPETRATOR only)**

15 177. Plaintiff re-alleges and incorporates by reference herein each and every allegation
16 contained herein above as though fully set forth and brought in this cause of action.

17 178. California *Penal Code* § 288(a) provides that "... a person who willfully and lewdly
18 commits any lewd or lascivious act, including any of the acts constituting other crimes provided
19 for in Part 1, upon or with the body, or any part or member thereof, of a child who is under the age
20 of 14 years, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
21 desires of that person or the child, is guilty of a felony and shall be punished by imprisonment in
22 the state prison for three, six, or eight years.."

23 179. The DOE PERPETRATOR engaged in lewd and lascivious acts with Plaintiff while
24 Plaintiff was under eighteen years of age, in violation of California *Penal Code* § 288(a).

25 180. Under California law, victims of childhood sexual abuse are entitled to bring civil
26 actions for violations of *Penal Code* provisions that prohibit adults from engaging in sexual acts
27 with minors, including *Penal Code* § 286(a)-(b)(1). *See Angie M. v. Superior Court*, (1995) 37
28 Cal.App.4th 1217, 1224-1225.

181. The DOE PERPETRATOR's above-noted actions in engaging in lewd and

1 lascivious acts with the minor Plaintiff were the proximate and legal causes of physical,
2 psychological, emotional, and economic damages Plaintiff has suffered and continues to suffer to
3 this day. It also has resulted in Plaintiff incurring, and will require him to incur into the future,
4 expenses for medical and psychological treatment, therapy, and counseling.

5 182. The above-described conduct of the DOE PERPETRATOR was oppressive,
6 malicious and despicable in that it was intentional and done in conscious disregard for the rights
7 and safety of Plaintiff, and was carried out with a conscious disregard of Plaintiff's right to be free
8 from such tortious behavior, such as to constitute oppression, fraud or malice pursuant to California
9 *Civil Code* section 3294, entitling Plaintiff to punitive damages against the DOE PERPETRATOR
10 in an amount appropriate to punish and set an example of him.

11
12 **FIFTEENTH CAUSE OF ACTION**
13 **VIOLATION OF *PENAL CODE* § 647.6(a)(1)**
(Against Defendant DOE PERPETRATOR only)

14 183. Plaintiff re-alleges and incorporates by reference herein each and every allegation
15 contained herein above as though fully set forth and brought in this cause of action.

16 184. California *Penal Code* § 647.6(a)(1) provides that "[e]very person who annoys or
17 molests any child under 18 years of age shall be punished by a fine not exceeding five thousand
18 dollars (\$5,000), by imprisonment in a county jail not exceeding one year, or by both the fine and
19 imprisonment."

20 185. The DOE PERPETRATOR sexually molested and annoyed the Plaintiff while
21 Plaintiff was under eighteen years of age, in violation of California *Penal Code* § 647.6(a)(1).

22 186. Under California law, victims of childhood sexual abuse are entitled to bring civil
23 actions for violations of *Penal Code* provisions that prohibit adults from engaging in sexual acts
24 with minors, including *Penal Code* § 647.6(a)(1). See *Angie M. v. Superior Court*, (1995) 37
25 Cal.App.4th 1217, 1224-1225.

26 187. The DOE PERPETRATOR's above-noted actions in annoying and molesting the
27 minor Plaintiff were the proximate and legal causes of physical, psychological, emotional, and
28 economic damages Plaintiff has suffered and continues to suffer to this day. It also has resulted in

1 Plaintiff incurring, and will require him to incur into the future, expenses for medical and
2 psychological treatment, therapy, and counseling.

3 188. The above-described conduct of the DOE PERPETRATOR was oppressive,
4 malicious and despicable in that it was intentional and done in conscious disregard for the rights
5 and safety of Plaintiff, and was carried out with a conscious disregard of Plaintiff's right to be free
6 from such tortious behavior, such as to constitute oppression, fraud or malice pursuant to California
7 *Civil Code* section 3294, entitling Plaintiff to punitive damages against the DOE PERPETRATOR
8 in an amount appropriate to punish and set an example of him.

9 **PRAYER FOR RELIEF**

10 Wherefore, Plaintiff prays for Judgment against Defendants as follows:

- 11 1. For past, present and future general damages in an amount to be determined at
12 trial;
- 13 2. For past, present and future special damages, including but not limited to past,
14 present and future lost earnings, economic damages and others, in an amount to be
15 determined at trial;
- 16 3. Any appropriate statutory damages, including attorneys' fees;
- 17 4. For costs of suit;
- 18 5. For pre- and post-judgment interest as allowed by law;
- 19 6. For attorney's fees pursuant to the aforementioned statutes and otherwise allowable
20 by law:
 - 21 a. *California Code of Civil Procedure* § 1021.5;
 - 22 b. *California Code of Civil Procedure* § 1021.4 as to the DOE
23 PERPETRATOR only;
 - 24 c. *California Civil Code* §52;
- 25 7. With regard to the Tenth Cause of Action for Fraudulent Transfer, Plaintiff(s)
26 request:
 - 27 a. A judgment declaring that the Transfer of Asset(s) were void and invalid;
 - 28

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DEMAND FOR JURY TRIAL

A trial by jury is hereby demanded by Plaintiff.

Dated: November 29, 2022

LIAKOS LAW, APC

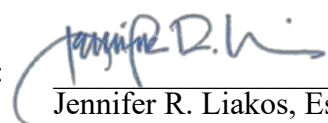
By: 
Jennifer R. Liakos, Esq.
Attorney for Plaintiff

EXHIBIT A

JENNIFER R. LIAKOS, ESQ. (SBN #207487)
LIAKOS LAW, APC
955 Deep Valley Drive
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Attorney for Plaintiff LL John Doe JRO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

LL JOHN DOE JRO, individually,

Plaintiff,

v.

DEFENDANT DOE DIOCESE;
DEFENDANT DOE PARISH; DEFENDANT
DOE RELIGIOUS ORDER, DEFENDANT
DOES 1 through 500, inclusive,

Defendants.

NORTHERN CALIFORNIA CLERGY
CASES

JCCP 5108

Judge: Hon. Evelio Grillo
Department: 21

NOTICE OF ADOPTION FORM

Plaintiff # _____

Alameda Superior Court
Case No.

COMES NOW, PLAINTIFF # _____, who, pursuant to the Court's Case Management Order, hereby submits this Notice of Adoption of the Master Complaint filed in the above captioned case. Plaintiff incorporates by reference only those causes of action marked below in this Notice of Adoption Form. Plaintiff agrees to be bound by any rulings with respect to the pleadings. And adopts any and all amendments made to the Master Complaint.

Plaintiff hereby adopts the following causes of action as alleged in the Master Complaint:

1. First Cause of Action: INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS
(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS
ORDER, DOE PERPETRATOR and DOES 1 through 500) ☐

2. Second Cause of Action: HUMAN TRAFFICKING (*CIVIL CODE* §52.5)(Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500) ☐

3. Third Cause of Action: NEGLIGENCE (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, and DOES 1 through 500) ☒

4. Fourth Cause of Action: NEGLIGENT SUPERVISION (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, and DOES 1 through 500) ☒

5. Fifth Cause of Action: NEGLIGENT RETENTION/HIRING (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, and DOES 1 through 500) ☒

6. Sixth Cause of Action: NEGLIGENT FAILURE TO TRAIN, WARN OR EDUCATE (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, and DOES 1 through 500) ☒

7. Seventh Cause of Action: BREACH OF FIDUCIARY DUTY (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500) ☐

8. Eighth Cause of Action CONSTRUCTIVE FRAUD (*CIVIL CODE* § 1573) (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500) ☐

9. Ninth Cause of Action: SEXUAL HARASSMENT (*CIVIL CODE* § 51.9) (Against Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE PERPETRATOR and DOES 1 through 500) ☒

1 10. Tenth Cause of Action: FRAUDULENT TRANSFER (Against Defendants DOE
2 ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE
3 PERPETRATOR and DOES 1 through 500) ☐

4 11. Eleventh Cause of Action: SEXUAL BATTERY (Against Defendants DOE
5 ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE
6 PERPETRATOR and DOES 1 through 500) ☐

7 12. Twelfth Cause of Action: SEXUAL ASSAULT (Against Defendants DOE
8 ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER, DOE
9 PERPETRATOR and DOES 1 through 500) ☒

10 13. Thirteenth Cause of Action: GENDER VIOLENCE (*Civil Code* § 52.4) (Against
11 Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER,
12 DOE PERPETRATOR and DOES 1 through 500) ☐

13 14. Fourteenth Cause of Action: VIOLATION OF *PENAL CODE* § 288(a) (Against
14 Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER,
15 DOE PERPETRATOR and DOES 1 through 500) ☐

16 15. Fifteenth Cause of Action: VIOLATION OF *PENAL CODE* § 647.6(a)(1) ((Against
17 Defendants DOE ARCHDIOCESE, DOE DIOCESE, DOE PARISH, DOE RELIGIOUS ORDER,
18 DOE PERPETRATOR and DOES 1 through 500) ☐

19 Plaintiff also hereby adopts the following paragraphs as alleged in the Master Complaint:
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- | | | |
|---|---|---|
| 21 1. <input checked="" type="checkbox"/> | 22 5. <input type="checkbox"/> | 23 9. <input type="checkbox"/> |
| 24 2. <input type="checkbox"/> | 25 6. <input checked="" type="checkbox"/> | 26 10. <input type="checkbox"/> |
| 27 3. <input checked="" type="checkbox"/> | 28 7. <input checked="" type="checkbox"/> | 11. <input type="checkbox"/> |
| 4. <input type="checkbox"/> | 8. <input checked="" type="checkbox"/> | 12. <input checked="" type="checkbox"/> |

1	13. <input checked="" type="checkbox"/>	j. <input checked="" type="checkbox"/>	41. <input type="checkbox"/>
2	14. <input checked="" type="checkbox"/>	k. <input checked="" type="checkbox"/>	42. <input checked="" type="checkbox"/>
3	15. <input checked="" type="checkbox"/>	l. <input checked="" type="checkbox"/>	43. <input checked="" type="checkbox"/>
4	16. <input checked="" type="checkbox"/>	m. <input checked="" type="checkbox"/>	44. <input checked="" type="checkbox"/>
5	17. <input checked="" type="checkbox"/>	30. <input checked="" type="checkbox"/>	45. <input checked="" type="checkbox"/>
6	18. <input checked="" type="checkbox"/>	a. <input checked="" type="checkbox"/>	46. <input checked="" type="checkbox"/>
7	19. <input type="checkbox"/>	b. <input type="checkbox"/>	47. <input type="checkbox"/>
8	20. <input checked="" type="checkbox"/>	31. <input checked="" type="checkbox"/>	48. <input type="checkbox"/>
9	21. <input checked="" type="checkbox"/>	a. <input checked="" type="checkbox"/>	49. <input type="checkbox"/>
10	22. <input checked="" type="checkbox"/>	b. <input checked="" type="checkbox"/>	50. <input type="checkbox"/>
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15	27. <input checked="" type="checkbox"/>	36. <input checked="" type="checkbox"/>	55. <input type="checkbox"/>
16	28. <input checked="" type="checkbox"/>	a. <input checked="" type="checkbox"/>	56. <input type="checkbox"/>
17	29. <input checked="" type="checkbox"/>	b. <input checked="" type="checkbox"/>	a. <input type="checkbox"/>
18	a. <input checked="" type="checkbox"/>	c. <input checked="" type="checkbox"/>	b. <input type="checkbox"/>
19	b. <input checked="" type="checkbox"/>	d. <input checked="" type="checkbox"/>	c. <input type="checkbox"/>
20	c. <input checked="" type="checkbox"/>	e. <input checked="" type="checkbox"/>	d. <input type="checkbox"/>
21	d. <input checked="" type="checkbox"/>	f. <input checked="" type="checkbox"/>	57. <input type="checkbox"/>
22	e. <input type="checkbox"/>	g. <input checked="" type="checkbox"/>	58. <input type="checkbox"/>
23	f. <input checked="" type="checkbox"/>	37. <input checked="" type="checkbox"/>	59. <input type="checkbox"/>
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26	i. <input checked="" type="checkbox"/>	40. <input checked="" type="checkbox"/>	62. <input type="checkbox"/>
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1	63. <input checked="" type="checkbox"/>	89. <input checked="" type="checkbox"/>	115. <input type="checkbox"/>
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19	81. <input checked="" type="checkbox"/>	107. <input type="checkbox"/>	121. <input type="checkbox"/>
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21	83. <input checked="" type="checkbox"/>	109. <input type="checkbox"/>	123. <input type="checkbox"/>
22	84. <input checked="" type="checkbox"/>	110. <input type="checkbox"/>	124. <input type="checkbox"/>
23	85. <input checked="" type="checkbox"/>	111. <input type="checkbox"/>	125. <input type="checkbox"/>
24	86. <input checked="" type="checkbox"/>	112. <input type="checkbox"/>	126. <input type="checkbox"/>
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1	129. <input type="checkbox"/>	155. <input type="checkbox"/>	179. <input type="checkbox"/>
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4	132. <input type="checkbox"/>	a. <input type="checkbox"/>	182. <input type="checkbox"/>
5	133. <input type="checkbox"/>	b. <input type="checkbox"/>	183. <input type="checkbox"/>
6	134. <input type="checkbox"/>	158. <input type="checkbox"/>	184. <input type="checkbox"/>
7	135. <input type="checkbox"/>	159. <input type="checkbox"/>	185. <input type="checkbox"/>
8	136. <input type="checkbox"/>	160. <input type="checkbox"/>	186. <input type="checkbox"/>
9	137. <input checked="" type="checkbox"/>	161. <input type="checkbox"/>	187. <input type="checkbox"/>
10	138. <input checked="" type="checkbox"/>	162. <input type="checkbox"/>	188. <input type="checkbox"/>
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12	140. <input checked="" type="checkbox"/>	164. <input type="checkbox"/>	
13	141. <input checked="" type="checkbox"/>	165. <input type="checkbox"/>	
14	142. <input checked="" type="checkbox"/>	166. <input checked="" type="checkbox"/>	
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17	145. <input checked="" type="checkbox"/>	169. <input checked="" type="checkbox"/>	
18	146. <input checked="" type="checkbox"/>	170. <input checked="" type="checkbox"/>	
19	147. <input checked="" type="checkbox"/>	171. <input checked="" type="checkbox"/>	
20	148. <input checked="" type="checkbox"/>	172. <input checked="" type="checkbox"/>	
21	149. <input checked="" type="checkbox"/>	173. <input type="checkbox"/>	
22	150. <input checked="" type="checkbox"/>	174. <input type="checkbox"/>	
23	151. <input type="checkbox"/>	175. <input type="checkbox"/>	
24	152. <input type="checkbox"/>	176. <input type="checkbox"/>	
25	153. <input type="checkbox"/>	177. <input type="checkbox"/>	
26	154. <input type="checkbox"/>	178. <input type="checkbox"/>	
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Plaintiff also alleges the following causes of action not alleged in the Master Complaint: ☐

CAUSE OF ACTION SIXTEEN

For _____

(Against Defendants _____ and DOES 1 through 500)

189. The PLAINTIFF re-alleges and incorporates by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action. ☐

190. _____ ☐

191. Defendants' actions were the legal and proximate cause of PLAINTIFF'S damages. ☐

192. Plaintiff #___: was subjected to sexual abuse by Defendant DOE PERPETRATOR approximately ___ times between approximately the following date(s):

Year (if known): _____ to Year (if known) _____

(*Please attach additional pages, if necessary)

193. Cause of action for _____ ☐

194. Cause of action for _____ ☐

195. Cause of action for _____ ☐

196. Cause of action for _____ ☐

197. Cause of action for _____ ☐

196. Cause of action for _____ ☐

Factual Allegations Specific to Plaintiff ☒

Venue is proper in this County because this case will be added to the coordinated proceeding currently pending before Judge Evelio M. Grillo in Department 21 of the Alameda County Superior Court.

Plaintiff, LL JOHN DOE JRO, is an adult male born on December 3, 1940. Plaintiff is a current resident of Danville, Contra Costa County, California. The allegations set forth in this Complaint occurred in Contra Costa County. Plaintiff was a minor, approximately 12 to 14 years old, when the sexual assault alleged herein occurred, beginning in approximately 1952.

1 Beginning in approximately 1952, Plaintiff was a parishioner, member, and/or attendee of Defendant
2 DOE PARISH in Richmond, Contra Costa County, California. Upon information and belief, at all times
3 relevant, Father Thomas Bresnahan was an ordained priest in the Roman Catholic Church and was
4 assigned to Defendant DOE DIOCESE, Defendant DOE PARISH, and Defendant DOE RELIGIOUS
5 ORDER. Plaintiff believed Father Bresnahan was a trusted adult.

6
7 In the early 1950s, Plaintiff attended camp each summer. In approximately 1952, Father Bresnahan
8 told Plaintiff, and other children, that he had to check them like a doctor exam before camp. Father
9 Bresnahan took Plaintiff into a separate room where the two of them were alone. He made Plaintiff disrobe
10 and then fondled Plaintiff's genitals. Father Bresnahan told Plaintiff not to tell anyone. This happened
11 each year before camp for following additional two years.

12
13 As a direct and proximate result of the wrongful conduct alleged herein, Plaintiff has suffered, and
14 continues to suffer physical injury, shame, shock, emotional distress, physical manifestations of emotional
15 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has
16 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from
17 performing Plaintiff's daily activities and obtaining the full enjoyment of life; and/or has incurred and will
18 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

19
20 **PLAINTIFF'S PRAYER FOR RELIEF:**

- 21 1. For past, present and future general damages in an amount to be determined at trial; ☒
- 22 2. For past, present and future special damages, including but not limited to past, present
23 and future lost earnings, economic damages and others, in an amount to be determined at
24 trial; ☒
- 25 3. Any appropriate statutory damages, including attorneys' fees; ☒
- 26 4. For costs of suit; ☒
- 27 5. For pre- and post-judgment interest as allowed by law; ☒
- 28

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6. For attorney's fees pursuant to the aforementioned statutes and otherwise allowable by law: ☐
- a. California *Code of Civil Procedure* § 1021.5; ☒
 - b. California *Code of Civil Procedure* § 1021.4 as to the DOE PERPETRATOR only; ☐
 - c. California *Civil Code* §52; ☐
7. With regard to the Tenth Cause of Action for Fraudulent Transfer, Plaintiff(s) request: ☐
- a. A judgment declaring that the Transfer of Asset(s) were void and invalid; ☐
 - b. A money judgment against the transferees of the Assets for the value of the Transferred Asset(s); ☐
 - c. Imposition and enforcement of a lien in favor of Plaintiff(s) on the Transfer of Asset(s); ☐
 - d. Other appropriate legal or equitable relief, including an attachment lien or other provisional remedy, an injunction against further disposition of the Transfer of Asset(s) or its proceeds, and/or the appointment of a receiver to take charge of the asset(s) transferred or its proceeds; ☐ and/or
 - e. In the alternative, that the Transfer of Asset(s) were void and invalid, a judgment declaring that the purported creation and purpose of the Transfer of Asset(s) was void and invalid, and that all assets held or previously held are subject to the claims of Plaintiff(s). ☐
8. For such other and further relief as the court may deem proper. ☒


Plaintiff ____ also asserts the following damages prayer(s) not asserted in the Master Complaint: ☐

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Plaintiff makes a demand for a trial by jury. ☒

Dated: November 29, 2022

LIAKOS LAW, APC

By: 

Jennifer R. Liakos, Esq.
Attorney for Plaintiff

Exhibit 2

FILED

Superior Court of California
County of Alameda

05/29/2024

Clad Flake, Executive Officer / Clerk of the Court

By: Nicole Hall Deputy
N. Hall

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

IN RE NORTHERN CALIFORNIA CLERGY Alameda County Lead Case No: HG20053992
CASES

JCCP NO. 5108

Judge: Honorable Noel Wise

Coordination Trial Judge

Dept: 21

Applies to All Cases In JCCP 5108:

**~~PROPOSED~~ ORDER ADDING ON
CASES TO JCCP 5108**

The Court finds that the cases identified on Exhibit A hereto are properly added on to Judicial
Council Coordination Proceeding 5108, "The Northern California Clergy Cases", are collectively
complex, and share common questions of law and fact with those cases currently included in JCCP

1 5108. The Court further finds that inclusion of the cases identified on Exhibit A is consistent with the
2 purposes and scope of the Order Granting Petition to Coordinate filed on July 22, 2020. The Court has
3 reviewed all of the cases on Exhibit A and has determined that each of the cases should be added
4 to Northern California Clergy Cases, JCCP 5108, for the reasons set forth above.

5 On the court's own motion:

6
7 It is ORDERED: each of the cases on Exhibit A (each an "Individual Case") is added to
8 Northern California Clergy Cases, JCCP 5108. (CRC 3.544.) If any party in an Individual
9 Case objects to such case being added to the JCCP then the objecting party must promptly
10 contact the JCCP Liaison Counsel. If the objecting party continues to object to the addition of
11 an Individual Case to the JCCP coordinated proceeding after coordinating with Liaison Counsel,
12 the objecting party may file a noticed motion to remove the case from the JCCP. Any such
13 motion shall be filed under the Individual Case number, and not the JCCP case number.
14

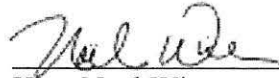
15 Therefore, the Court Orders that each Individual Case identified on the attached Exhibit A is
16 added on to JCCP 5108. Plaintiffs' Counsel are ordered to file Notice of this Order Adding On Cases in
17 each Individual Case.

18 This Order is intended to solely be a ministerial act for purposes of managing the
19 Court's docket, and not a continuation of any Individual Case against a debtor in bankruptcy
20 or otherwise in violation of 11 U.S.C. § 362(a). In adding on the cases set forth on Exhibit
21 A to JCCP 5108, this Court is not making any determination regarding the applicability or
22 extent of the bankruptcy automatic stay as to any Individual Case; any such determinations
23 being subject to the jurisdiction of the applicable Bankruptcy Court. Further, this Order is
24 not intended to, and shall not be deemed to, waive, violate, modify, or abrogate the rights or
25 benefits of any person arising under Title 11 of the United States Code, including without
26 limitation the automatic stay pursuant to 11 U.S.C. § 362(a).
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05/29/2024

Dated: May __, 2024



Hon. Noel Wise
Coordination Trial Judge
Noel Wise / Judge

EXHIBIT A: CASES ADDED ON TO JCCP 5108 BY THIS ORDER:

JCCP 5108 - NORTHERN CALIFORNIA CLERGY CASES

List for Omnibus Add-on Order

5/23/2024 4:51 PM

Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
604	22CV024859	John Doe PA.L. v. Doe Diocese, et al.	Alexander	12/29/22
605	22CV024869	John Doe S.R. v. Doe Diocese, et al.	Alexander	12/29/22
606	22CV024976	Jane Doe M.F. v. Doe Archdiocese, et al.	Alexander	12/30/22
1144	22CV023447	John Doe SAC 1920 v. Doe 1, et al.	Anderson	12/09/22
1145	22CV020063	John Doe SF 1121 v. Doe 1, et al.	Anderson	10/20/22
1146	22CV023453	John Doe SAC 1926 v. Doe 1, et al.	Anderson	12/09/22
1148	22CV020072	John Doe SJ 1122 v. Doe 1, et al.	Anderson	10/20/22
1151	22CV021596	John Doe SAC 1124 v. Doe 1, et al.	Anderson	11/14/22
1152	22CV021591	John Doe OK 1495 v. Doe 1, et al.	Anderson	11/14/22
1153	22CV024587	John Doe OK 1930 v. Doe 1, et al.	Anderson	12/26/22
1154	22CV020074	John Doe SF 1496 v. Doe 1, et al.	Anderson	10/20/22
1155	22CV020075	John Doe OK 1497 v. Doe 1, et al.	Anderson	10/20/22
1158	22CV020080	John Doe SAC 1126 v. Doe 1, et al.	Anderson	10/20/22
1159	22CV020112	John Doe SAC 1127 v. Doe 1, et al.	Anderson	10/20/22

JCCP 5108 - NORTHERN CALIFORNIA CLERGY CASES

List for Omnibus Add-on Order

5/23/2024 4:51 PM

Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1163	22CV020085	John Doe OK 1131 v. Doe 1, et al.	Anderson	10/20/22
1167	22CV020822	Jane Doe OK 1133 v. Doe 1, et al.	Anderson	10/31/22
1169	22CV023079	Jane Doe SF 1861 v. Doe 1, et al.	Anderson	12/05/22
1175	22CV022325	John Doe SF 1707 v. Doe 1, et al.	Anderson	11/21/22
1180	22CV023463	John Doe SAC 1924 v. Doe 1, et al.	Anderson	12/09/22
1186	22CV024954	John Doe SAC 2055 v. Doe 1, et al.	Anderson	12/30/22
1187	22CV024838	John Doe OK 2028 v. Doe 1, et al.	Anderson	12/28/22
1205	22CV023062	John Doe OK 1877 v. Doe 1, et al.	Anderson	12/05/22
1214	22CV020210	John Doe SAC 1506 v. Doe 1, et al.	Anderson	10/21/22
1216	22CV024532	John Doe OK 1941 v. Doe 1, et al.	Anderson	12/23/22
1227	22CV023450	Jane Doe SR 1159 v. Doe 1, et al.	Anderson	12/09/22
1228	22CV020672	John Doe SF 1643 v. Doe 1, et al.	Anderson	10/27/22
1230	22CV020875	John Doe SF 1509 v. Doe 1, et al.	Anderson	11/01/22
1232	22CV024752	John Doe SF 2028 v. Doe 1, et al.	Anderson	12/28/22

JCCP 5108 - NORTHERN CALIFORNIA CLERGY CASES

List for Omnibus Add-on Order

5/23/2024 4:51 PM

Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1238	22CV024881	John Doe SR 2043 v. Doe 1, et al.	Anderson	12/29/22
1239	22CV020876	John Doe SF 1163 v. Doe 1, et al.	Anderson	11/01/22
1241	22CV023086	John Doe SR 1862 v. Doe 1, et al.	Anderson	12/05/22
1247	22CV020462	Jane Doe SF 1169 v. Doe 1, et al.	Anderson	10/25/22
1249	22CV020454	John Doe SAC 1171 v. Doe 1, et al.	Anderson	10/25/22
1250	22CV020455	Jane Doe OK 1172 v. Doe 1, et al.	Anderson	10/25/22
1256	22CV023239	John Doe OK 1514 v. Doe 1, et al.	Anderson	12/06/22
1257	22CV023756	John Doe OK 1946 v. Doe 1, et al.	Anderson	12/13/22
1263	22CV020423	John Doe OK 1178 v. Doe 1, et al.	Anderson	10/24/22
1264	22CV022032	Jane Doe FR 1518 v. Doe 1, et al.	Anderson	11/17/22
1268	22CV023755	John Doe SR 1947 v. Doe 1, et al.	Anderson	12/13/22
1269	22CV020457	Jane Doe SAC 1519 v. Doe 1, et al.	Anderson	10/25/22
1271	22CV020458	Jane Doe SF 1422 v. Doe 1, et al.	Anderson	10/25/22
1273	22CV020459	John Doe SAC 1180 v. Doe 1, et al.	Anderson	10/25/22

JCCP 5108 - NORTHERN CALIFORNIA CLERGY CASES

List for Omnibus Add-on Order

5/23/2024 4:51 PM

Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1278	22CV024464	John Doe SF 1999 v. Doe 1, et al.	Anderson	12/22/22
1281	22CV024836	John Doe SF 2039 v. Doe 1, et al.	Anderson	12/28/22
1283	22CV022037	Jane Doe OK 1525 v. Doe 1, et al.	Anderson	11/17/22
1284	22CV023243	John Doe FR 1907 v. Doe 1, et al.	Anderson	12/06/22
1295	22CV023606	Christopher Jackson v. Doe 1, et al.	Anderson	12/12/22
1297	22CV020661	Jane Doe OK 1192 v. Doe 1, et al.	Anderson	10/27/22
1298	22CV023947	Jane Doe SF 1954 v. Doe 1, et al.	Anderson	12/15/22
1299	22CV024559	John Doe SR 2010 v. Doe 1, et al.	Anderson	12/23/22
1300	22CV023081	Jane Doe SAC 1193 v. Doe 1, et al.	Anderson	12/05/22
1304	22CV020664	John Doe SF 1196 v. Doe 1, et al.	Anderson	10/27/22
1306	22CV020670	John Doe SF 1426 v. Doe 1, et al.	Anderson	10/27/22
1308	22CV022039	John Doe SR 1647 v. Doe 1, et al.	Anderson	11/17/22
1309	22CV020878	John Doe SR 1199 v. Doe 1, et al.	Anderson	11/01/22
1311	22CV020669	John Doe SF 1201 v. Doe 1, et al.	Anderson	10/27/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1312	22CV020795	John Doe OK 1202 v. Doe 1, et al.	Anderson	10/31/22
1313	22CV023065	Jane Doe SAC 1891 v. Doe 1, et al.	Anderson	12/05/22
1314	22CV023608	John Doe SF 1937 v. Doe 1, et al.	Anderson	12/12/22
1315	22CV020796	John Doe SR 1285 v. Doe 1, et al.	Anderson	10/31/22
1316	22CV023538	John Doe SF 1934 v. Doe 1, et al.	Anderson	12/12/22
1317	22CV020797	John Doe SR 1203 v. Doe 1, et al.	Anderson	10/31/22
1318	22CV023242	Jane Doe OK 1908 v. Doe 1, et al.	Anderson	12/06/22
1319	22CV020798	Jane Doe SAC 1204 v. Doe 1, et al.	Anderson	10/31/22
1320	22CV020799	John Doe SF 1205 v. Doe 1, et al.	Anderson	10/31/22
1321	22CV023066	Jane Doe SAC 1876 v. Doe 1, et al.	Anderson	12/05/22
1323	22CV024469	Jane Doe SF 1972 v. Doe 1, et al.	Anderson	12/22/22
1324	22CV020800	John Doe FR 1206 v. Doe 1, et al.	Anderson	10/31/22
1327	22CV020803	John Doe SF 1209 v. Doe 1, et al.	Anderson	10/31/22
1328	22CV020512	John Doe FR 1211 v. Doe 1, et al.	Anderson	10/25/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1329	22CV023067	John Doe SF 1882 v. Doe 1, et al.	Anderson	12/05/22
1330	22CV020879	John Doe SF 1212 v. Doe 1, et al.	Anderson	11/01/22
1331	22CV020881	John Doe SAC 1286 v. Doe 1, et al.	Anderson	11/01/22
1332	22CV024599	John Doe SR 2020 v. Doe 1, et al.	Anderson	12/27/22
1333	22CV023455	John Doe SF 1913 v. Doe 1, et al.	Anderson	12/09/22
1335	RG20061260	Matthew McLennan	Anderson	05/14/20
1336	22CV020888	John Doe SF 1216 v. Doe 1, et al.	Anderson	11/01/22
1337	22CV020891	John Doe FR 1217 v. Doe 1, et al.	Anderson	11/01/22
1340	22CV021136	John Doe SF 1218 v. Doe 1, et al.	Anderson	11/03/22
1346	22CV022045	John Doe SF 1220 v. Doe 1, et al.	Anderson	11/17/22
1349	22CV020804	John Doe SF 1532 v. Doe 1, et al.	Anderson	10/31/22
1352	22CV020823	John Doe SR 1222 v. Doe 1, et al.	Anderson	10/31/22
1353	22CV023558	Jane Doe SF 1912 v. Doe 1, et al.	Anderson	12/12/22
1356	22CV024486	John Doe SR 1987 v. Doe 1, et al.	Anderson	12/22/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1358	22CV020827	John Doe SR 1535 v. Doe 1, et al.	Anderson	10/31/22
1360	22CV020828	John Doe SF 1224 v. Doe 1, et al.	Anderson	10/31/22
1361	22CV020519	John Doe OK 1225 v. Doe 1, et al.	Anderson	10/25/22
1362	22CV022100	John Doe SR 1650 v. Doe 1, et al.	Anderson	11/17/22
1368	22CV023069	John Doe SF 1894 v. Doe 1, et al.	Anderson	12/05/22
1369	22CV024063	John Doe SF 1948 v. Doe 1, et al.	Anderson	12/16/22
1370	22CV023969	John Doe SF 1944 v. Doe 1, et al.	Anderson	12/15/22
1373	22CV024597	Jane Doe SF 2017 v. Doe 1, et al.	Anderson	12/26/22
1375	22CV024801	John Doe SR 2035 v. Doe 1, et al.	Anderson	12/28/22
1381	22CV024449	John Doe SF 1974 v. Doe 1, et al.	Anderson	12/22/22
1382	22CV024451	John Doe SR 1991 v. Doe 1, et al.	Anderson	12/22/22
1386	23CV025012	John Doe SR 2067 v. Doe 1, et al.	Anderson	01/03/23
1388	22CV022326	John Doe OK 1240 v. Doe 1, et al.	Anderson	11/21/22
1389	22CV020834	John Doe SF 1241 v. Doe 1, et al.	Anderson	10/31/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1390	22CV024194	John Doe SF 1976 v. Doe 1, et al.	Anderson	12/20/22
1391	22CV023400	Jane Doe OK 1925 v. Doe 1, et al.	Anderson	12/09/22
1392	22CV023950	Jane Doe OK 1953 v. Doe 1, et al.	Anderson	12/15/22
1394	22CV020807	Jane Doe MR 1427 v. Doe 1, et al.	Anderson	10/31/22
1396	22CV020837	John Doe OK 1242 v. Doe 1, et al.	Anderson	10/31/22
1401	22CV020840	John Doe SF 1246 v. Doe 1, et al.	Anderson	10/31/22
1409	22CV024454	John Doe SAC 1980 v. Doe 1, et al.	Anderson	12/22/22
1410	22CV023561	John Doe SF 1933 v. Doe 1, et al.	Anderson	12/12/22
1411	22CV020567	John Doe SF 1251 v. Doe 1, et al.	Anderson	10/26/22
1414	22CV023559	John Doe SF 1923 v. Doe 1, et al.	Anderson	12/12/22
1415	22CV021700	John Doe SF 1254 v. Doe 1, et al.	Anderson	11/15/22
1416	22CV023607	John Doe SF 1929 v. Doe 1, et al.	Anderson	12/11/22
1418	22CV024471	John Doe OK 2001 v. Doe 1, et al.	Anderson	12/22/22
1421	22CV021706	John Doe SR 1256 v. Doe 1, et al.	Anderson	11/15/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1422	22CV020808	John Doe OK 1257 v. Doe 1, et al.	Anderson	10/31/22
1423	22CV023074	Jane Doe SAC 1884 v. Doe 1, et al.	Anderson	12/05/22
1424	22CV021707	Jane Doe SR 1706 v. Doe 1, et al.	Anderson	11/15/22
1428	22CV020424	John Doe SAC 1545 v. Doe 1, et al.	Anderson	10/24/22
1429	22CV021712	John Doe OK 1259 v. Doe 1, et al.	Anderson	11/15/22
1430	22CV020842	Jane Doe SF 1260 v. Doe 1, et al.	Anderson	10/31/22
1433	22CV021895	John Doe SF 1261 v. Doe 1, et al.	Anderson	11/16/22
1434	22CV023754	John Doe SF 1943 v. Doe 1, et al.	Anderson	12/13/22
1435	22CV020809	John Doe SF 1262 v. Doe 1, et al.	Anderson	10/31/22
1436	22CV020811	John Doe FR 1430 v. Doe 1, et al.	Anderson	10/31/22
1438	22CV021896	John Doe SF 1547 v. Doe 1, et al.	Anderson	11/16/22
1439	22CV021899	John Doe MR 1263 v. Doe 1, et al.	Anderson	11/16/22
1440	22CV023560	John Doe SF 1885 v. Doe 1, et al.	Anderson	12/12/22
1441	22CV021901	Jane Doe SF 1264 v. Doe 1, et al.	Anderson	11/16/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1442	22CV021904	Jane Doe FR 1265 v. Doe 1, et al.	Anderson	11/16/22
1443	22CV021909	Jane Doe OK 1266 v. Doe 1, et al.	Anderson	11/16/22
1445	22CV021921	John Doe SR 1269 v. Doe 1, et al.	Anderson	11/16/22
1447	22CV023076	John Doe SF 1878 v. Doe 1, et al.	Anderson	12/05/22
1449	22CV020570	John Doe SF 1270 v. Doe 1, et al.	Anderson	10/26/22
1450	22CV020873	John Doe MR 1431 v. Doe 1, et al.	Anderson	11/01/22
1451	22CV020817	John Doe SF 1548 v. Doe 1, et al.	Anderson	10/31/22
1454	22CV021922	John Doe MR 1272 v. Doe 1, et al.	Anderson	11/16/22
1455	22CV021924	John Doe SF 1549 v. Doe 1, et al.	Anderson	11/16/22
1456	22CV024880	John Doe OK 2044 v. Doe 1, et al.	Anderson	12/29/22
1457	22CV021927	John Doe SF 1658 v. Doe 1, et al.	Anderson	11/16/22
1458	22CV021928	John Doe SF 1680 v. Doe 1, et al.	Anderson	11/16/22
1459	22CV021932	John Doe SR 1550 v. Doe 1, et al.	Anderson	11/16/22
1460	22CV021934	John Doe SF 1659 v. Doe 1, et al.	Anderson	11/16/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1461	22CV020818	John Doe SF 1275 v. Doe 1, et al.	Anderson	10/31/22
1462	22CV021935	John Doe FR 1660 v. Doe 1, et al.	Anderson	11/16/22
1463	22CV021937	Jane Doe SAC 1432 v. Doe 1, et al.	Anderson	11/16/22
1464	22CV021938	John Doe SAC 1276 v. Doe 1, et al.	Anderson	11/16/22
1467	22CV021946	Jane Doe OK 1552 v. Doe 1, et al.	Anderson	11/16/22
1469	22CV021831	John Doe SR 1278 v. Doe 1, et al.	Anderson	11/16/22
1471	22CV023082	John Doe SF 1860 v. Doe 1, et al.	Anderson	12/05/22
1472	22CV021947	John Doe OK 1279 v. Doe 1, et al.	Anderson	11/16/22
1475	22CV021951	John Doe SR 1280 v. Doe 1, et al.	Anderson	11/16/22
1479	22CV024193	John Doe SJ 1966 v. Doe 1, et al.	Anderson	12/20/22
1485	22CV020820	Jane Doe SF 1283 v. Doe 1, et al.	Anderson	10/31/22
1601	23CV036496	Jane Doe SAC 2076 v. Doe 1, et. al.	Anderson	06/22/23
1602	23CV036477	John Doe SR 2075 v. Doe 1, et. al.	Anderson	06/22/23
1603	23CV036634	John Doe SAC 2088 v. Doe 1, et. al.	Anderson	06/22/23

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1604	23CV036292	John Doe SF 2073 v. Doe 1, et. al.	Anderson	06/20/23
1605	23CV036581	John Doe SR 2072 v. Doe 1, et. al.	Anderson	06/22/23
1606	23CV036502	John Doe SR 2072 v. Doe 1, et. al.	Anderson	06/22/23
1619	23CV057728	John Doe SAC 1911 v. Doe 1, et. al.	Anderson	12/14/23
1620	23CV057725	John Doe SAC 2068 v. Doe 1, et. al.	Anderson	12/14/23
454		John ED Roe SF v. Doe Archdiocese et al	Andrew Van Arsdale	10/21/22
1124	22CV007792	ANDREW HOVIOUS v. The Roman Catholic Bishop of Fresno, et al	Andrews Thornton	03/02/22
1125	22CV016472	DARRYL MAJOR v. DOE DIOCESE et al	Andrews Thornton	08/18/22
1129	22CV016031	YVETTE RODRIQUEZ v. Doe Diocese et al	Andrews Thornton	08/11/22
1141	23CV046748	David Egan v. Doe 1, et. al.,	Andrews Thornton	12/21/22
865	22CV023397	John Doe S.F.S. v. Doe 1 Diocese, et al	Boucher	12/08/22
872	22CV023153	John Doe J.L.H. v. Doe 1 Diocese, et al	Boucher	12/05/22
1565	23CV037093	John Doe G.N. v. Doe 1, et al.	Boucher	04/19/22
917	22CV024918	John Doe D.W. v. Doe 1 Diocese, et al	Boucher/ Beasley	12/29/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
909	22CV022600	John Doe D.H.S. v. Doe 1 Diocese, et al	Boucher/ Pearson Warshaw	11/28/22
451	22CV023763	John Doe RC v. Doe 1	Dimarco Araujo	12/13/22
446	22CV007590	JOHN DOE J.L. vs. DOE DIOCESE ONE, a Corporation sole, et al	Drivon	02/25/22
457	22CV024819	John Doe GR v DOE DIOCESE ONE, et al	Drivon	12/28/22
458	22CV024965	John Doe F.O. v DOE ONE ARCH DIOCESE, et al	Drivon	12/28/22
601	22CV024730	John Doe K.L v Doe Diocese A corporation Sole, et al	Drivon	12/27/22
797	22CV023490	John Doe CLG01986 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
798	22CV023323	John Doe CLG02191 v. Doe Diocese et al.	Edwards & de la Cerda	12/07/22
799	22CV023491	John Doe CLG02673 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
800	22CV023492	John Doe CLG03350 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
801	22CV023494	John Doe CLG03308 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
802	22CV023495	John Doe CLG03340 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
803	22CV023676	John Doe CLG03361 v. Doe Diocese et al.	Edwards & de la Cerda	12/12/22
804	22CV023502	John Doe CLG03381 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
805	22CV023501	John Doe CLG02259 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
806	22CV023503	John Doe CLG02103 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/09/22
807	22CV024091	John Doe CLG02521 v. Doe Diocese et al.	Edwards & de la Cerda	12/16/22
808	22CV023509	John Doe CLG03427 v. Doe Diocese et al.	Edwards & de la Cerda	12/09/22
809	22CV023517	John Doe CLG03402 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/09/22
810	22CV023920	John Doe CLG03446 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/15/22
811	22CV023924	John Doe CLG03358 v. Doe Diocese et al.	Edwards & de la Cerda	12/15/22
812	22CV023940	John Doe CLG03415 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/15/22
813	22CV023945	John Doe CLG03426 v. Doe Diocese et al.	Edwards & de la Cerda	12/15/22
814	22CV023948	John Doe CLG03354 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/15/22
815	22CV024021	John Doe CLG03301 v. Doe Diocese et al.	Edwards & de la Cerda	12/16/22
816	22CV024031	John Doe CLG03459 v. Doe Diocese et al.	Edwards & de la Cerda	12/16/22
817	22CV024191	John Doe CLG03489 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/20/22
818	22CV024195	John Doe CLG03304 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
819	22CV024152	John Doe CLG03504 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22
820	22CV024151	John Doe CLG03442 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22
821	22CV024154	John Doe CLG03488 v. Doe Diocese et al.	Edwards & de la Cerda	12/22/22
822	22CV024153	John Doe CLG03522 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/20/22
823	22CV024200	John Doe CLG03506 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22
824	22CV024155	John Doe CLG03492 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22
825	22CV024157	John Doe CLG03505 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22
826	22CV024207	John Doe CLG03473 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/20/22
827	22CV024212	John Doe CLG03533 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/20/22
828	22CV024229	John Doe CLG03472 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/20/22
829	22CV024150	John Doe CLG03485 v. Doe Diocese et al.	Edwards & de la Cerda	12/20/22
830	22CV024399	John Doe CLG03259 v. Doe Diocese et al.	Edwards & de la Cerda	12/21/22
831	22CV024400	John Doe CLG03444 v. Doe Diocese et al.	Edwards & de la Cerda	12/22/22
832	22CV024366	John Doe CLG03476 v. Doe Diocese et al.	Edwards & de la Cerda	12/22/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
833	22CV024362	John Doe CLG03441 v. Doe Archdiocese et al.	Edwards & de la Cerda	12/22/22
834	22CV024364	John Doe CLG03348 v. Doe Diocese et al.	Edwards & de la Cerda	12/22/22
835	22CV024530	John Doe CLG03460 v. Doe Diocese et al.	Edwards & de la Cerda	12/23/22
836	22CV024749	John Doe CLG02828 v. Doe Diocese et al.	Edwards & de la Cerda	12/28/22
787	22CV023627	John Doe BCS 1936 v. Brothers of the Christian Schools, et al	FJSlaw / Anderson	12/12/22
790	22CV024022	John Doe JO 1940 v. Society of Jesus, et al	FJSlaw / Anderson	12/16/22
794	22CV024639	John Doe SALS 2013 v Doe 1	FJSlaw / Anderson	12/27/22
795	22CV024865	John Doe SALS 2024 v Roman Catholic Bishop of San Francisco, et al	FJSlaw / Anderson	12/29/22
935	22CV019009	JENNIFER DOE FR 431 v. DOE 1, et al.	George, Jr	10/04/22
936	22CV019006	JENNIFER DOE FR 434 v. DOE 1, et al.	George, Jr	10/04/22
937	22CV019008	JENNIFER DOE FR 437 v. DOE 1, et al.	George, Jr	10/04/22
938	22CV019807	JOSEPH DOE FR 583 v. DOE 1, et al.	George, Jr	10/17/22
941	22CV019002	JOSEPH DOE FR 430 v. DOE 1, et al.	George, Jr	10/04/22
942	22CV019003	JOSEPH DOE FR 430 v. DOE 1, et al.	George, Jr	10/04/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
943	22CV019007	JOSEPH DOE FR 436 v. DOE 1, et al.	George, Jr	10/04/22
945	22CV019005	JOSEPH DOE FR 595 v. DOE 1, et al.	George, Jr	10/04/22
981	22CV024069	JENNIFER DOE OAK 599 v. DOE 1, et al.	George, Jr	12/16/22
1020	22CV019026	JOSEPH DOE S 501 v. DOE 1, et al.	George, Jr	10/05/22
1022	22CV018202	JOSEPH DOE S 503 v. DOE 1, et al.	George, Jr	09/20/22
1023	22CV018204	JOSEPH DOE S 504 v. DOE 1, et al.	George, Jr	09/21/22
1024	22CV018205	JOSEPH DOE S 505 v. DOE 1, et al.	George, Jr	09/22/22
1028	22CV019029	JOSEPH DOE S 508 v. DOE 1, et al.	George, Jr	10/05/22
1029	22CV019030	JENNIFER DOE S 509 v. DOE 1, et al.	George, Jr	10/05/22
1030	22CV019031	JOSEPH DOE S 510 v. DOE 1, et al.	George, Jr	10/05/22
1036	22CV019040	JOSEPH DOE S 515 v. DOE 1, et al.	George, Jr	10/05/22
1037	22CV019042	JOSEPH DOE S 516 v. DOE 1, et al.	George, Jr	10/05/22
1038	22CV019043	JOSEPH DOE S 517 v. DOE 1, et al.	George, Jr	10/05/22
1039	22CV024663	JENNIFER DOE SCW v. DOE 1, et al.	George, Jr	12/27/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1040	22CV019044	JOSEPH DOE S 518 v DOE 1, et al.	George, Jr	10/05/22
1041	22CV019045	JOSEPH DOE S 519 v DOE 1, et al.	George, Jr	10/05/22
1042	22CV019055	JOSEPH DOE S 520 v. DOE 1, et al.	George, Jr	10/05/22
1044	22CV024852	JOSEPH DOE S 602 v. DOE 1, et al.	George, Jr	12/28/22
1046	22CV019059	JOSEPH DOE S 522 v. DOE 1, et al.	George, Jr	10/05/22
1047	22CV019809	JENNIFER DOE S 523 v. DOE 1, et al.	George, Jr	10/17/22
1048	22CV019061	JOSEPH DOE S 524 v. DOE 1, et al.	George, Jr	10/05/22
1049	22CV019066	JENNIFER DOE S 525 v. DOE 1, et al.	George, Jr	10/05/22
1050	22CV019069	JENNIFER DOE S 526 v. DOE 1, et al.	George, Jr	10/05/22
1054	22CV019067	JENNIFER DOE S 528 v. DOE 1, et al.	George, Jr	10/05/22
1055	22CV024412	JENNIFER DOE S 598 v. DOE 1, et al.	George, Jr	12/20/22
1056	22CV019068	JENNIFER DOE S 529 v. DOE 1, et al.	George, Jr	10/05/22
1060	22CV019414	JOSEPH DOE SF 534 v. DOE 1, et al.	George, Jr	10/11/22
1086	22CV024791	JOHN DOE 164 v. DOE 1, et al.	George, Jr	12/28/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1088	22CV019227	JOSEPH DOE SR 586 v. DOE 1, et al.	George, Jr	10/07/22
1089	22CV019229	JOSEPH DOE SR 594 v. DOE 1, et al.	George, Jr	10/07/22
1092	22CV022429	JOSEPH DOE SR 554 v. DOE 1, et al.	George, Jr	11/22/22
1093	22CV019238	JOSEPH DOE SR 558 v. DOE 1, et al.	George, Jr	10/07/22
1106	22CV024798	JOHN DOE 11 v. DOE 1, et al.	George, Jr	12/28/22
1108	22CV024036	JOSEPH DOE SR 568 v. DOE 1, et al.	George, Jr	12/16/22
1113	22CV021239	JOSEPH DOE X 572 v. DOE 1, et al.	George, Jr	11/07/22
1515	22CV023680	John MG Doe v. RCASF, et al	Gross Belsky	12/13/22
1516	22CV024582	John AS Doe v RCASF, et al.	Gross Belsky	12/23/22
1517	22CV024598	John WP Doe v RCASF, et al.	Gross Belsky	12/27/22
1518	22CV022809	John DL Doe v RCBO, et al.	Gross Belsky	11/29/22
1520	22CV024657	John MH Doe v. RCASF, et al.	Gross Belsky	12/27/22
1625	23CV030984	John JP Doe v. RCBO, et al.	Gross Belsky	04/11/23
1542	22CV021737	LL JOHN DOE DJ v. DEFENDANT DOE DIOCESE, et al.	Liakos Law	11/15/2022

JCCP 5108 - NORTHERN CALIFORNIA CLERGY CASES

List for Omnibus Add-on Order

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1546	22CV022760	LL JOHN DOE JRO v. DEFENDANT DOE DIOCESE, et al.	Liakos Law	11/29/22
216	22CV015221	Jane SF-6 Doe v. DOE ARCHDIOCESE	Manly Stewart	07/28/22
218	22CV015203	John SF-23 Doe v. DOE ARCHDIOCESE	Manly Stewart	07/28/22
220	22CV017728	John S-12 Doe v. DOE DIOCESE	Manly Stewart	09/12/22
221	22CV015297	John OAK-14 Doe v. DOE DIOCESE	Manly Stewart	07/29/22
230	22CV017769	Jane SF-24 Doe v. DOE ARCH DIOCESE	Manly Stewart	12/29/22
232	22CV015278	John SF-30 Doe v. DOE ARCHDIOCESE	Manly Stewart	07/28/22
233	22CV015318	John SF-12 Doe v. DOE ARCHDIOCESE	Manly Stewart	07/29/22
266	RG20064084	John OAK-7 Doe v. DOE I, et al.	Manly Stewart	06/10/20
267	RG2006221	John OAK-9 Doe v. Doe I, et al.	Manly Stewart	06/10/20
307	22CV019560	John SR-13 Doe v. Doe Diocese, et al.	Manly Stewart	10/12/22
308	22CV019558	John SR-10 Doe v. Doe Diocese, et al.	Manly Stewart	10/12/22
309	22CV019538	John M-4 Doe v. Doe Diocese, et al.	Manly Stewart	10/12/22
310	22CV019565	John SF-11 Doe v. Doe Archdiocese	Manly Stewart	10/12/22

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List for Omnibus Add-on Order

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
311	22CV019851	John S-14 Doe v. Doe Diocese, et al.	Manly Stewart	10/12/22
337	22CV020699	John SR-14 Doe v. Doe Diocese, et al	Manly Stewart	10/27/22
347	22CV020718	Jane SF-9 Doe v. Doe Archdiocese	Manly Stewart	10/27/22
352	22CV020724	John FR-5 Doe v. Doe Diocese et al.	Manly Stewart	10/27/22
405	22CV022896	John M-5 Doe v. Doe Diocese et al.	Manly Stewart	11/30/22
417	22CV023660	John SF-35 Doe v. Doe Archdiocese, et al.	Manly Stewart	12/12/22
448	22CV023996	John OAK-18 Doe v. Doe Diocese et al	Manly Stewart	12/15/22
465	22CV024529	John SR-16 Doe v. Doe Diocese	Manly Stewart	12/23/22
466	22CV024525	John M-6 Doe v. Doe Diocese et al	Manly Stewart	12/23/22
467	22CV024876	John M-7 Doe v. Doe Diocese et al	Manly Stewart	12/30/22
468	22CV024691	John M-8 Doe v. Doe Diocese et al	Manly Stewart	12/27/22
555	22CV024692	John M-11 Doe v. Doe Diocese et al	Manly Stewart	12/27/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
556	22CV024959	John M-15 Doe v. Doe Diocese et al	Manly Stewart	12/30/22
557	22CV024964	John M-15 Doe v. Doe Diocese et al	Manly Stewart	12/28/22
558	22CV024710	John SF-36 Doe v. Doe Archdiocese	Manly Stewart	12/29/22
559	22CV024718	John M-10 Doe v. Doe Diocese et al	Manly Stewart	12/17/22
560	22CV024779	John M-12 Doe v. Doe Diocese et al	Manly Stewart	12/28/22
561	22CV024712	John M-13 Doe v. Doe Diocese et al	Manly Stewart	12/27/22
562	22CV024714	John M-14 Doe v. Doe Diocese et al	Manly Stewart	12/27/22
563	22CV024693	John M-16 Doe v. Doe Diocese et al	Manly Stewart	12/27/22
596	22CV024697	John SR-17 Doe v. Doe Diocese, et al.	Manly Stewart	12/27/22
598	22CV024709	John M-17 Doe v. Doe Diocese et al	Manly Stewart	12/27/22
599	22CV024714	John M-19 Doe v. Doe Diocese, et al.	Manly Stewart	12/27/22
603	22CV024855	John M-18 Doe v. Doe Diocese, et al.	Manly Stewart	12/27/22
1585	23CV036988	John S-17 Doe v. Doe Diocese I, et al.	Manly Stewart	06/27/23
1609	23CV050840	John SR-18 Doe v. Doe Parish, et al.	Manly Stewart	10/03/23

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1581 , 1582, 1583	23CV036545	Jan M. Zoccoli, et al. v. Doe 1, et al.	Mezzetti / Starceovich	11/28/22
842	22CV024510	Jane LA Roe v. Doe 1, et al.	Nye, Sterling	12/23/22
844	22CV012253	Jane CC Roe v. Doe 1, et al.	Nye, Sterling	12/27/22
849	24CV075447	John RJ Roe v. Roman Catholic Bishop of Fresno, et al.	Nye, Sterling	06/17/22
374	22CV022055	Robert Beamer v. Doe Archdiocese, et al.	Panish Shea/PCVA	11/17/22
384	22CV023748	John Doe (P.K.) v. Doe Archdiocese, et al.	Panish Shea/PCVA	12/13/22
406	22CV023292	John Doe (N.D.) v. Doe Archdiocese, et al.	Panish Shea/PCVA	12/07/22
409	22CV022536	Todd Black v. Doe Archdiocese, et al.	Panish Shea/PCVA	11/22/22
39	RG20048852	Michael Lopez v. Roman Catholic Bishop of Oakland, et al	Panish Shea/PCVA	01/02/20
386	22CV022163	Jane Doe (T.M.) v. Doe Archdiocese, et al.	Panish Shea/PCVA	11/21/22
387	22CV021530	Deborah Lynn Martinez v. Doe Archdiocese, et al.	Panish Shea/PCVA	11/10/22
388	22CV024190	Jane Doe (D.M.) v. Doe Archdiocese, et al.	Panish Shea/PCVA	12/19/22
390	22CV021467	John Doe (S.M.) v. Doe Archdiocese, et al.	Panish Shea/PCVA	11/09/22
392	22CV022056	Jane Doe (D.P.) v. Doe Archdiocese, et al.	Panish Shea/PCVA	11/17/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
136	HG21114359	John Doe (J.S.) v. Doe 1	Panish Shea/PCVA	09/30/21
114	22CV014137	JOHN DOE (J.W.) v. DOE 1, et al.	Panish Shea/PCVA/A WKO	07/11/22
385	22CV023329	John Doe (R.K.) v. Doe Archdiocese, et al.	Panish Shea/PCVA/S HC	12/07/22
394	22CV022491	Ramiro Sosa, Jr. v. Doe Archdiocese, et al.	Panish Shea/PCVA/S HC	11/22/22
223	22CV019077	Jane Doe JS v. Doe Archdiocese	Paul Mones	10/05/22
225	22CV019104	Jane Doe MC v. Doe Archdiocese	Paul Mones	10/05/22
226	22CV019105	Jane Doe MK v. Doe Archdiocese	Paul Mones	10/05/22
600	22CV024846	John Doe JV v. Doe Diocese, et al.	Paul Mones/Hurley McKenna &	12/28/22
1590	23CV048907	Jane Roe vs. Doe 1 Diocese	Rehm	12/29/22
616	22CV014860	Jane Roe 235 v. Doe Archdiocese et al.	Slater Slater	07/22/22
617	22CV015050	Jane Roe 236 v. Doe Archdiocese et al.	Slater Slater	07/26/22
618	22CV015045	Jane Roe 237 v. Doe Archdiocese et al.	Slater Slater	07/26/22
619	22CV015140	Jane Roe 416 v. Doe Diocese et al.	Slater Slater	07/27/22
621	22CV015357	Jane Roe 250 v. Doe Diocese e al.	Slater Slater	08/01/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
622	22CV015361	John Roe 449 v. Doe Diocese et al.	Slater Slater	08/01/22
623	22CV015506	John Roe 508 v. The Roman Catholic Bishop Of Santa Rosa et al.	Slater Slater	08/03/22
624	22CV015517	John Roe 239 v. Doe Diocese et al.	Slater Slater	08/03/22
625	22CV015576	John Roe 462 v. Doe Diocese nal.	Slater Slater	08/04/22
626	22CV015539	John Roe 415 v. Doe Diocese ns al.	Slater Slater	08/03/22
627	22CV015541	John Roe 371 v. Doe Archdiocese et al.	Slater Slater	08/03/22
628	22CV015545	Jane Roe 265 v. Doe Diocese et al.	Slater Slater	08/03/22
629	22CV015553	John Roe 214 v. Doe Diocese et al.	Slater Slater	08/03/22
630	22CV015550	Jane Roe 190 v. Doe Diocese et al.	Slater Slater	08/03/22
632	22CV015558	John Roe 378 v. Doe Diocese et al.	Slater Slater	08/03/22
633	22CV015557	John Roe 457 v. Doe Archdiocese et al.	Slater Slater	08/03/22
634	22CV016191	John Roe 527 v. Doe Archdiocese et al.	Slater Slater	08/15/22
635	22CV016198	John Roe 256 v. Doe Diocese et al.	Slater Slater	08/15/22
636	22CV016206	John Roe 497 v. Doe Diocese et al.	Slater Slater	08/15/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
637	22CV016210	John Roe 525 v. Doe Diocese et al.	Slater Slater	08/15/22
638	22CV016202	Jane Roe 385 v. Doe Diocese et al.	Slater Slater	08/15/22
639	22CV016280	John Roe 546 v. Doe Archdiocese et al.	Slater Slater	08/16/22
640	22CV016284	John Roe 111 v. Doe Diocese et al.	Slater Slater	08/16/22
641	22CV016335	John Roe 239 v. Doe Archdiocese et al.	Slater Slater	08/17/22
642	22CV016337	John Roe 316 v. Doe Archdiocese et al.	Slater Slater	08/17/22
643	22CV016476	John Roe 566 v. The Roman Catholic Bishop of Santa Rosa et al.	Slater Slater	08/18/22
644	22CV016482	John Roe 582 v. The Roman Catholic Bishop of Santa Rosa et al.	Slater Slater	08/18/22
645	22CV016487	Jane Roe 246 v. The Roman Catholic Bishop Of Fresno et al.	Slater Slater	08/18/22
646	22CV016488	John Roe 444 v. The Roman Catholic Bishop of Fresno et al.	Slater Slater	08/18/22
647	22CV016490	John Roe 456 v. Doe Diocese et al.	Slater Slater	08/18/22
648	22CV016672	Jane Roe 583 v. Roman Catholic Bishop of Sacramento et al.	Slater Slater	08/22/22
649	22CV016997	John Roe 469 v. Doe Diocese et al.	Slater Slater	08/29/22
650	22CV016998	John Roe 233 v. Doe Archdiocese et al.	Slater Slater	08/29/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
651	22CV017001	John Roe 178 v. Doe Diocese et al.	Slater Slater	08/29/22
652	22CV017334	John Roe 74 v. Doe Archdiocese et al.	Slater Slater	09/06/22
653	22CV017431	John Roe 451 v. The Roman Catholic Bishop Of Fresno et al.	Slater Slater	09/07/22
654	22CV017403	John Roe 221 v. Doe Archdiocese et al.	Slater Slater	09/07/22
655	22CV017338	John Roe 593 v. The Roman Catholic Bishop of Santa Rosa et al.	Slater Slater	09/06/22
656	22CV017479	John Roe 252 v. Doe Diocese et al.	Slater Slater	09/08/22
657	22CV017502	Jane Roe 343 v. Doe Archdiocese et al.	Slater Slater	09/09/22
658	22CV017506	John Roe 420 v. Doe Diocese 1 et al.	Slater Slater	09/09/22
659	22CV017507	John Roe 562 v. Doe Diocese et al.	Slater Slater	09/09/22
660	22CV018066	John Roe 152 v. Doe Diocese et al.	Slater Slater	09/16/22
661	22CV018069	John Roe 292 v. Doe Diocese et al.	Slater Slater	09/16/22
662	22CV018177	John Roe 484 v. Doe Diocese et al.	Slater Slater	09/19/22
663	22CV018180	John Roe 304 v. Doe Diocese et al.	Slater Slater	09/19/22
664	22CV018460	John Roe 476 v. Doe Diocese et al.	Slater Slater	09/26/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
665	22CV018437	John Roe 487 v. The Roman Catholic Bishop of Fresno et al.	Slater Slater	09/26/22
666	22CV018694	John Roe 188 v. Doe Archdiocese et al.	Slater Slater	09/28/22
667	22CV018700	John Roe 217 v. Doe Diocese et al.	Slater Slater	09/28/22
668	22CV018756	Jane Roe 601 v. The Roman Catholic Bishop Of Fresno et al.	Slater Slater	09/29/22
669	22CV018779	John Roe 540 v. Doe Diocese et al.	Slater Slater	09/29/22
670	22CV018782	John Roe 413 v. Roman Catholic Bishop Of Sacramento et al.	Slater Slater	09/29/22
671	22CV018786	John Roe 414 v. Doe Diocese et al.	Slater Slater	09/29/22
672	22CV018837	Jane Roe 523 v. Doe Archdiocese et al.	Slater Slater	09/30/22
674	22CV018853	John Roe 521 v. Doe Archdiocese et al.	Slater Slater	09/30/22
675	22CV018871	John Roe 417 v. Doe Archdiocese et al.	Slater Slater	09/30/22
676	22CV018873	John Roe 366 v. Doe Archdiocese et al.	Slater Slater	09/30/22
677	22CV018979	John Roe 276 v. Doe Diocese et al.	Slater Slater	10/03/22
679	22CV018998	Jane Roe 477 v. The Roman Catholic Bishop Of Oakland et al.	Slater Slater	10/04/22
682	22CV019020	John Roe 397 v. Doe Archdiocese et al.	Slater Slater	10/05/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
683	22CV019818	John Roe 394 v. The Roman Catholic Archbishop Of San Francisco et al.	Slater Slater	10/17/22
690	22CV019954	John Roe 517 v. Doe Archdiocese et al.	Slater Slater	10/18/22
702	22CV021077	John Roe 303 v. Doe Diocese et al.	Slater Slater	11/03/22
704	22CV021087	John Roe 302 v. Doe Diocese et al.	Slater Slater	11/03/22
711	22CV021244	Jane Roe 427 v. Doe Diocese et al.	Slater Slater	11/07/22
712	22CV021252	John Roe 424 v. Doe Diocese et al.	Slater Slater	11/07/22
713	22CV021258	John Roe 612 v. Doe Diocese et al.	Slater Slater	11/07/22
714	22CV021259	John Roe 319 v. Doe Diocese et al.	Slater Slater	11/07/22
722	22CV021429	Jane Roe 574 v. Roman Catholic Bishop Of Sacramento et al.	Slater Slater	11/09/22
723	22CV021439	Jane Roe 675 v. Roman Catholic Bishop Of Sacramento et al.	Slater Slater	11/09/22
736	22CV022554	John Roe 282 v. Doe Diocese et al.	Slater Slater	11/23/22
742	22CV022840	John Roe 621 v. Doe Archdiocese et al.	Slater Slater	11/30/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
743	22CV022847	John Roe 687 v. Doe Diocese et al.	Slater Slater	11/30/22
747	22CV023180	Jane Roe 684 v. Doe Diocese et al.	Slater Slater	12/05/22
748	22CV023195	John Roe 547 v. Doe Diocese et al.	Slater Slater	12/06/22
753	22CV023204	Jane Roe 641 v. Doe Archdiocese et al.	Slater Slater	12/06/22
754	22CV023411	John Roe 359 v. Doe Archdiocese et al.	Slater Slater	12/09/22
756	22CV023667	Jane Roe 504 v. Doe Diocese et al.	Slater Slater	12/12/22
757	22CV023675	John Roe 685 v. Doe Diocese et al.	Slater Slater	12/12/22
766	22CV023908	John Roe 627 v. Doe Diocese et al.	Slater Slater	12/14/22
768	22CV023916	John Roe 663 v. Doe Archdiocese et al.	Slater Slater	12/15/22
770	22CV023926	Jane Roe 657 v. Doe Diocese et al.	Slater Slater	12/15/22

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
772	22CV024004	John Roe 695 v. Doe Diocese et al.	Slater Slater	12/15/22
774	22CV024008	John Roe 678 v. Doe Diocese et al.	Slater Slater	12/15/22
775	22CV024019	John Roe 633 v. Doe Archdiocese et al.	Slater Slater	12/16/22
777	22CV024128	John Roe 669 v. Doe Diocese et al.	Slater Slater	12/19/22
779	22CV024177	John Roe 146 v. Doe Diocese et al.	Slater Slater	12/19/22
780	22CV024156	John Roe 179 v. Doe Archdiocese et al.	Slater Slater	12/19/22
783	22CV024395	John Roe 696 v. Doe Diocese et al.	Slater Slater	12/22/22
1569	22CV024492	John Roe 651 v. Doe Diocese et al.	Slater Slater	12/23/22
1571	23CV025768	John Roe 701 v. RCBSR et al.	Slater Slater	01/17/23

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1572	23CV030277	John Roe 499 v. RCASF et al.	Slater Slater	03/30/23
1632	24CV072753	John Doe v. Roman Catholic Diocese of Fresno; et al.	Taylor Ring	03/02/23
470	22CV023336	John Doe FO v Doe 1	Turner	12/08/22
587	22CV023681	John Doe 180 v. The Roman Catholic Bishop of Santa Rosa	Winer Burritt	12/13/22
475	22CV023091	John JG Roe Oak v. Doe 1	Zalkin	12/05/22
486	22CV023416	John JP Roe Oak v. Doe 1	Zalkin	12/08/22
487	22CV023423	John RS Roe Oak v. Doe 1	Zalkin	12/09/22
494	22CV023684	John GE Roe Oak v. Doe 1	Zalkin	12/13/22
1595	23CV036182	John JR2 Roe SR v. Doe 1	Zalkin	06/15/23
1596	23CV036395	Anthony Waters v. Doe 1	Zalkin	06/20/23
1597	23CV036338	William Kidd v. Doe 1	Zalkin	06/20/23

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Plf#	Alameda County Case #	Caption	Plf Counsel	Filed
1598	23CV036375	Brian Cornell v. Doe 1	Zalkin	06/20/23
1599	23CV036475	Shannon Lombardi v. Doe 1	Zalkin	06/21/23
1600	23CV037235	John MA Roe SF v. Doe 1	Zalkin	06/26/23

<p align="center">SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA</p>		<p align="center">Reserved for Clerk's File Stamp</p>
<p>COURTHOUSE ADDRESS: Rene C. Davidson Courthouse 1225 Fallon Street, Oakland, CA 94612</p>		<p align="center">FILED Superior Court of California County of Alameda 05/29/2024 Chad Finke, Executive Officer / Clerk of the Court By: <u>Nicole Hall</u> Deputy N. Hall</p>
<p>PLAINTIFF/PETITIONER: John Doe OK 1014</p>		
<p>DEFENDANT/RESPONDENT: DOE 1 et al</p>		
<p align="center">CERTIFICATE OF ELECTRONIC SERVICE CODE OF CIVIL PROCEDURE 1010.6</p>		<p>CASE NUMBER: HG20053992</p>

I, the below named Executive Officer/Clerk of Court of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served one copy of the Order [PROPOSED] ORDER ADDING ON CASES TO JCCP 5108 entered herein upon each party or counsel of record in the above entitled action, by electronically serving the document(s) from my place of business, in accordance with standard court practices.

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Chad Finke, Executive Officer / Clerk of the Court

Dated: 05/29/2024

By:

Nicole Hall

N. Hall, Deputy Clerk

SHORT TITLE: Doe OK 1014 VS DOE 1

CASE NUMBER: HG20053992

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Superior Court of California, County of Alameda
Department 21, Administration Building

Case Number: JCCP005108
Case Name: Northern California Clergy Cases

ORDER ADDING ON CASES TO JCCP 5108

DECLARATION OF ELECTRONIC SERVICE

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to "Order Authorizing Electronic Service", entered in these coordinated proceedings on January 25, 2021, via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on May 29, 2024

Executive Officer/Clerk of the Superior Court

By Nicole Hall
Deputy Clerk

Exhibit 3



FOLEY & LARDNER LLP

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CLIENT/MATTER NUMBER
100845-0402

May 25, 2023

Via E-Mail

Jennifer R. Liakos, Esq.
LIAKOS LAW, APC
955 Deep Valley Drive, Suite 3900
Palos Verdes Peninsula, California 90274
Jenn@jennliakoslaw.com

Re: The Roman Catholic Bishop of Oakland - Bankruptcy Filing

Dear Counsel,

We are counsel to the Roman Catholic Bishop of Oakland, a California corporation sole ("RCBO"). We have received your request to accept service of the summons and complaint in Alameda Superior Court Case Number 22CV022760, LL John Doe JRO v. Doe Archdiocese, et al., (the "Superior Court Case").

On May 8, 2023, RCBO filed a Chapter 11 bankruptcy petition for relief. RCBO's bankruptcy case is pending as Case Number 23-40523 in the Bankruptcy Court for the Northern District of California, Oakland Division. Pursuant to 11 U.S.C. 362, filing of the petition caused an automatic stay barring "the commencement or continuation, including the issuance or employment of process" of any action against RCBO. The Superior Court Case is therefore stayed. A copy of the Notice of Chapter 11 Bankruptcy Case is attached hereto.

We cannot accept service of the summons in the Superior Court Case because the Superior Court case is stayed by the automatic stay. In addition, any attempt to serve RCBO going forward would be a willful violation of the automatic stay, enforceable in the Bankruptcy Court and giving rise to potential sanctions for contempt.

Sincerely,

Thomas F. Carlucci

TFCA:lgf

AUSTIN
BOSTON
CHICAGO
DALLAS
DENVER

DETROIT
HOUSTON
JACKSONVILLE
LOS ANGELES
MADISON

MEXICO CITY
MIAMI
MILWAUKEE
NEW YORK
ORLANDO

SACRAMENTO
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
TALLAHASSEE

TAMPA
WASHINGTON, D.C.
BRUSSELS
TOKYO

Debtors may request to receive Court notices and orders by email instead of U.S. mail. Sign Up at www.canb.uscourts.gov**Information to identify the case:**

Debtor The Roman Catholic Bishop of Oakland EIN: 94-1527086
 Name
 United States Bankruptcy Court California Northern Bankruptcy Court Date case filed for chapter: 11 5/8/23
 Case number: 23-40523

Official Form 309F1 (For Corporations or Partnerships)**Notice of Chapter 11 Bankruptcy Case**

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor's full name	The Roman Catholic Bishop of Oakland	
2. All other names used in the last 8 years	dba Diocese of Oakland, dba Roman Catholic Diocese of Oakland	
3. Address	2121 Harrison Street Suite 100 Oakland, CA 94612	
4. Debtor's attorney Name and address	Thomas F. Carlucci Foley & Lardner LLP 555 California Street Ste 1700 San Francisco, CA 94104-1520	Contact phone 415-434-4484
5. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case online at https://pacer.uscourts.gov .	Mailing Address: U.S. Bankruptcy Court 1300 Clay Street, Suite 300 Oakland, CA 94612	Hours open: Monday - Friday 9:00 am to 4:30 pm Contact phone (888) 821-7606 Date: 5/11/23
6. Meeting of creditors The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.	June 21, 2023 at 11:00 AM The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Via Tele/Videoconference Call in number/URL: 1-877-991-8832 Passcode: 4101242
Important Notice to Individual Debtors: The United States Trustee requires all debtors who are individuals to provide government-issued photo identification and proof of social security number to the trustee at the meeting of creditors. Failure to Appear May Result in the Dismissal of the Case without further notice. A request for a continuance or to be excused from appearing must be made in writing at least 7 days before the meeting, timely filed with the court at the address above in box 5.		

For more information, see page 2



<p>7. Proof of claim deadline</p> <p>For a bankruptcy case pending in the Northern District of California, a Proof of Claim may be filed electronically online at www.canb.uscourts.gov In the Quick Links section, click on "File an Electronic Proof of Claim."</p>	<p>Deadline for filing proof of claim:</p> <p>For all creditors (except a governmental unit): 9/11/23</p> <p>A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.</p> <p>Your claim will be allowed in the amount scheduled unless:</p> <ul style="list-style-type: none"> • your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>; • you file a proof of claim in a different amount; or • you receive another notice. <p>If your claim is not scheduled or if your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.</p> <p>You may review the schedules at the bankruptcy clerk's office or online at https://pacer.uscourts.gov.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>
<p>8. Exception to discharge deadline</p> <p>The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.</p>	<p>If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.</p> <p>Deadline for filing the complaint:</p>
<p>9. Creditors with a foreign address</p>	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>
<p>10. Filing a Chapter 11 bankruptcy case</p>	<p>Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.</p>
<p>11. Discharge of debts</p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.</p>

Exhibit 4

Fill in this information to identify the case:

Debtor 1 The Roman Catholic Bishop of Oakland

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Central District of California

Case number 23-40523

Official Form 410**Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	
<u>LL John Doe JRO</u> Name of the current creditor (the person or entity to be paid for this claim)	
Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?
	Where should payments to the creditor be sent? (if different)
	<div>Liakos Law, APC Name 955 Deep Valley Drive, Suite 3900 Number Street Palos Verdes Penins CA 90274 City State ZIP Code Contact phone (310) 961-0066 Contact email Jenn@jennliakoslaw.com</div>
	<div> Name Number Street City State ZIP Code Contact phone Contact email</div>
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
4. Does this claim amend one already filed?	
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☒ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$_____ Does this amount include interest or other charges?
☐ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

Personal Injury

9. Is all or part of the claim secured? ☒ No
☐ Yes. The claim is secured by a lien on property.
Nature of property:
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____

Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$_____
Amount of the claim that is secured: \$_____
Amount of the claim that is unsecured: \$_____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$_____

Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$_____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

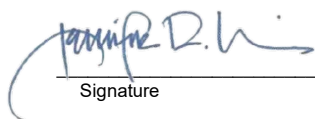
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/11/2023
MM / DD / YYYY


Signature

Print the name of the person who is completing and signing this claim:

Name Jennifer R. Liakos
First name Middle name Last name

Title Attorney

Company Liakos Law, APC
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 955 Deep Valley Drive, Suite 3900
Number Street

Palos Verdes Peninsula CA 90274
City State ZIP Code

Contact phone (310) 961-0066 Email Jenn@jennliakoslaw.com